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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GERI BARRIENTOS and MICHAEL
FOERST, individually and on behalf of all
others similarly situated,

Plaintiffs,
v.

TOYOTA MOTOR SALES, U.S.A., INC.,
TOYOTA MOTOR CORPORATION, and
TOYOTA MOTOR NORTH AMERICA,
INC.,

Defendants.

Case No.: 3:24-cv-03282

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

Plaintiffs Geri Barrientos and Michael Foerst, individually and on behalf of all others similarly situated, bring this action against Defendants Toyota Motor Sales, U.S.A., Inc., Toyota Motor Corporation, and Toyota Motor North America, Inc. (“Defendants” or “Toyota”), by and through their attorneys, and allege as follows based on (a) personal knowledge, (b) the investigation of counsel, and (c) information and belief.

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I. INTRODUCTION

1. This consumer class action arises from a latent defect found in model years (“MY”) 2019-2023 Toyota RAV4 and MY 2019-2023 Toyota Corolla vehicles (hereafter, the “Class Vehicles”).¹

2. This action arises from Defendants’ failure, despite their longstanding knowledge, to disclose to Plaintiffs and Class Members that the Class Vehicles contain defectively designed and/or manufactured coolant bypass valves (“the Defect”) that prematurely fail. When the Defect manifests, coolant leaks out of the closed-loop coolant system. This adversely impacts the ability of the coolant system to properly regulate the temperature of the engine, and can lead to engine overheating, stalling, increased emissions and catastrophic engine failure. In addition, the leaking coolant can leak into the surrounding engine components, including the electrical system, and damage those components. The leaking coolant can also corrode the sensor on the coolant bypass valve, which causes it to remain stuck in the “open” or “closed” position and thus impedes its ability to properly direct coolant throughout the engine, thereby impeding the ability of the engine to operate within the appropriate parameters.

3. Defendants actively concealed material facts regarding the Defect from Plaintiffs and Class Members, including (i) that the Class Vehicles were prone to the Defect and require costly repairs to fix; (ii) that Class Vehicles are subject to repeat failures of the coolant bypass valves because the purported repairs do not actually fix the Defect; and (iii) that the existence of the Defect would diminish the intrinsic and resale value of the Class Vehicles.

4. At all relevant times, Defendants knew, or through the exercise of reasonable care had reason to know, that the coolant bypass valves in the Class Vehicles were defective and that the existence of this Defect would materially affect Plaintiffs and the Class’s (defined below) decision to purchase the Class Vehicles.

¹ Plaintiffs reserve the right to amend the definition of the Class Vehicles after conducting discovery.

5. Defendants have long been aware of the Defect. Despite their longstanding knowledge, Defendants have been unable or unwilling to adequately repair the Class Vehicles at no cost to Plaintiffs and the Class when the Defect manifests.

6. Defendants omitted and/or concealed the existence of the Defect to increase profits by selling additional Class Vehicles. Knowledge and information regarding the Defect were in the exclusive and superior possession of Defendants and its dealers, and this information was not disclosed to Plaintiffs and members of the Class at the time of purchase, or otherwise.

7. Based on pre-production testing, pre-sale durability testing, failure mode analyses, bench testing, warranty and post-warranty claims, consumer complaints on forums monitored by Defendants, consumer complaints submitted to the federal government, and consumer complaints made to and by dealers and directly to Defendants, Defendants were aware of the Defect and omitted the existence of and/or fraudulently concealed the Defect from Plaintiffs and members of the Class.

8. Defendants have also refused to take any action to correct this concealed Defect when it manifests in the Class Vehicles outside of the warranty period. Because the Defect can manifest shortly outside of the warranty period for the Class Vehicles—and given Defendants' knowledge of the Defect—Defendants' attempt to limit the warranty is unconscionable and unenforceable.

9. As a result of Defendants' unfair, deceptive, and/or fraudulent business practices, owners and lessees of the Class Vehicles, including Plaintiffs, have suffered an ascertainable loss of money and/or property and/or loss in value. The unfair and deceptive trade practices committed by Defendants were conducted in a manner giving rise to substantial aggravating circumstances.

10. Had Plaintiffs and other Class Members known of the Defect at the time of purchase or lease, they would not have bought or leased their Class Vehicles, or would have paid substantially less for them.

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11. This case seeks protection and relief for owners and lessees of the Class Vehicles for the harm they have suffered, and seeks redress for Defendants' breaches of express and implied warranties, Defendants' unfair, unlawful, and deceptive trade practices, and for common law fraudulent concealment and unjust enrichment.

II. JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction of this action pursuant to 28 U.S.C. § 1332 of the Class Action Fairness Act of 2005 because: (i) there are 100 or more class members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of interest and costs, and (iii) there is minimal diversity because at least one plaintiff and one defendant are citizens of different States. This court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367 and jurisdiction over the Magnuson-Moss Warranty Act claim by virtue of diversity jurisdiction being exercised under the Class Action Fairness Act ("CAFA").

13. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391 because Defendants transact business in this district, are subject to personal jurisdiction in this district, and therefore are deemed to be citizens of this district. Additionally, a substantial part of the events or omissions giving rise to the claim occurred in this district, as Defendants have advertised in this district and have received substantial revenue and profits from its sales and/or leasing of Class Vehicles in this district. Toyota Motor North America, Inc. also maintains its Product Quality Field Office in San Francisco, California, which provides "a direct link between the customer and Toyota's design, quality, and manufacturing organizations" and "enable[s] Toyota to respond to customer issues quickly and effectively. The field office focuses its research on heating, ventilation, air conditioning, and vehicle drivability."²

14. This Court has personal jurisdiction over Defendants because they have conducted substantial business in this judicial district, and intentionally and purposefully placed Class Vehicles into the stream of commerce within the states of California and Florida,

² <https://www.toyota.com/usa/operations/map/usca> (last visited May 31, 2024).

1 and throughout the United States. Defendant Toyota Motor North America, Inc. is also
2 incorporated in the state of California.

3 **III. PARTIES**

4 **A. Plaintiffs**

5 **Plaintiff Geri Barrientos**

6 15. Plaintiff Geri Barrientos is a citizen of California, and currently resides in Bell
7 Gardens, California, and has at all times pertinent to this Complaint.

8 16. Plaintiff Barrientos purchased a 2020 Toyota RAV4 in June 2020 from Tustin
9 Toyota, an authorized Toyota dealership located in Tustin, California.

10 17. Plaintiff Barrientos purchased (and still owns) this vehicle, which is used for
11 personal, and/or household use. Her vehicle bears Vehicle Identification Number:
12 2T3W1RFV2LW083428.

13 18. In the months preceding her purchase, Plaintiff Barrientos researched and
14 viewed earlier model Toyota RAV4s as well as Toyota's advertisements online and on
15 television. Based on those advertisements, she understood that the 2020 Toyota RAV4 would
16 include various upgrades from their previous designs. In May 2020, Plaintiff Barrientos called
17 Tustin Toyota to place an order for the 2020 Toyota RAV4. She discussed the features of the
18 2020 Toyota RAV4 with Toyota's sales representatives. She also reviewed the window sticker.
19 None of these sources disclosed the Defect to Plaintiff Barrientos. Had these sources disclosed
20 the Defect, she would have seen the disclosure and it would have materially impacted her
21 decision to purchase her Class Vehicle.

22 19. On or around March 2024, when Plaintiff Barrientos' vehicle had approximately
23 40,723 miles on the odometer, a dashboard alert appeared stating "Engine Maintenance
24 Required: Visit Your Dealer." Plaintiff Barrientos thought she received the alert because she
25 was due for an oil change, so she brought her vehicle to a local mechanic to obtain an oil
26 change. The dashboard alert did not go away after obtaining an oil change. She began
27 researching the alert online and discovered that the alert related to the Defect and posted about
28 frequently online by others who experienced the Defect.

20. Plaintiff Barrientos contacted Penske Toyota, an authorized Toyota dealership located in Downey, California, to report the issue with the dashboard alert. Penske Toyota informed Plaintiff Barrientos that she would be required to pay \$200 just to diagnose the vehicle, and that the repairs would not be covered under warranty.

21. Because Penske Toyota would not provide the necessary repairs under warranty, Plaintiff Barrientos brought her vehicle to a local mechanic who diagnosed a coolant bypass valve failure.

22. Plaintiff Barrientos needed a safe and working vehicle, so she paid for the necessary repairs in the amount of \$300.

23. Neither Defendant, nor any of its agents, dealers, or other representatives informed Plaintiff Barrientos of the existence of the Defect prior to, or any time after, her purchase. Had Defendants informed Plaintiff Barrientos of the existence of the Defect, Plaintiff Barrientos would not have purchased her vehicle or would have paid substantially less for it.

24. Plaintiff Barrientos has suffered an ascertainable loss as a result of Defendants' omissions and/or misrepresentations associated with the Coolant Bypass Valve Defect, including, but not limited to, out-of-pocket losses associated with the Coolant Bypass Valve Defect, diminished value of her vehicle, and other consequential damages.

Plaintiff Michael Foerst

25. Plaintiff Michael Foerst is a citizen of Florida, and currently resides in Palm Harbor, Florida, and has at all times pertinent to this Complaint.

26. Plaintiff Foerst purchased a 2020 Toyota RAV4 in January 2020 from Sun Toyota, an authorized Toyota dealership located in Holiday, Florida.

27. Plaintiff Foerst purchased (and still owns) this vehicle, which is used for personal and/or household use. His vehicle bears Vehicle Identification Number: 2T3W1RFV0LC049327.

28. Prior to purchase, Plaintiff Foerst test drove various Toyota RAV4 vehicles at several local authorized Toyota dealerships, reviewed the window sticker, and discussed the

1 features of the Toyota RAV4 vehicles with Toyota's sales representatives. Specifically,
 2 Plaintiff Foerst discussed the warranty with Toyota's sales representatives, including what
 3 repairs were covered and the length of coverage. None of these sources disclosed the Defect
 4 to Plaintiff Foerst. Had these sources disclosed the Defect, he would have seen the disclosure
 5 and it would have materially impacted his decision to purchase his Class Vehicle.

6 29. On or around April 28, 2024, when Plaintiff Foerst's vehicle had approximately
 7 41,130 miles on the odometer, a dashboard alert appeared stating "Engine Maintenance
 8 Required: See Dealer." Plaintiff Foerst contacted Sun Toyota and scheduled an appointment
 9 to address the issue.

10 30. On April 30, 2024, Plaintiff Foerst brought his vehicle to Sun Toyota. Sun
 11 Toyota informed Plaintiff that the coolant bypass valve failed. Sun Toyota informed Plaintiff
 12 Foerst that he would be required to pay for the necessary repairs as they were not covered
 13 under the warranty.

14 31. Plaintiff Foerst needed a safe and working vehicle, so he paid for the necessary
 15 repairs in the amount of \$700.

16 32. Neither Defendant, nor any of its agents, dealers, or other representatives
 17 informed Plaintiff Foerst of the existence of the Defect prior to, or any time after, his purchase.
 18 Had Defendants informed Plaintiff Foerst of the existence of the Defect, Plaintiff Foerst would
 19 not have purchased his vehicle or would have paid substantially less for it.

20 33. Plaintiff Foerst has suffered an ascertainable loss as a result of Defendants'
 21 omissions and/or misrepresentations associated with the Coolant Bypass Valve Defect,
 22 including, but not limited to, out-of-pocket losses associated with the Coolant Bypass Valve
 23 Defect, diminished value of his vehicle, and other consequential damages.

24 **B. Defendants**

25 34. Defendants are automobile design, manufacturing, distribution, and/or service
 26 corporations doing business within the United States, and they design, develop, manufacture,
 27 distribute, market, sell, lease, warrant, service, and repair passenger vehicles, including the
 28 Class Vehicles.

35. Defendants Toyota Motor Sales, U.S.A., Inc. and Toyota Motor North America, Inc., are incorporated in California with their principal place of business at 6565 Headquarters Drive, Plano, TX 75024.

36. Defendant Toyota Motor Corporation (“TMC”) is a Japanese corporation, and the corporate parent of Toyota Motor North America, Inc. TMC, through its various subsidiaries and affiliates, designs, manufactures, markets, and distributes Toyota automobiles across the United States.

37. Defendant Toyota Motor North America, Inc. (“TMNA”) is a California corporation headquartered in Plano, Texas as of May 2017. TMNA operates as a wholly owned subsidiary of Toyota Motor Corporation (“TMC”), the Japanese parent company, and is the corporate parent of Toyota Motor Sales, U.S.A., Inc. (“TMS”). TMNA oversees government and regulatory affairs, energy, economic research, philanthropy, corporate advertising and corporate communications for all of TMC’s North American operations.

38. TMS is a California corporation headquartered in Plano, Texas. TMS is the U.S. sales and marketing division for TMC and TMNA, and oversees sales and other operations across the United States. TMS distributes Toyota parts and vehicles, which are then sold through Defendants’ network of dealers. Money received from the purchase of a Toyota vehicle from a dealership flows from the dealer to TMS.

39. There exists, and at all times herein mentioned existed, a unity of ownership between TMC, TMNA, and TMS and their agents such that any individuality or separateness between them has ceased and each of them is the alter ego of the others. Adherence to the fiction of the separate existence of Defendants, would, under the circumstances set forth in this complaint, sanction fraud and/or promote injustice.

40. Upon information and belief, Defendants TMNA and TMS communicate with TMC concerning virtually all aspects of the Toyota products TMNA and TMS distribute within the United States, including appropriate repairs for pervasive defects, and whether Toyota will cover repairs to parts customers claim to be defective. Toyota’s decision not to disclose the Defect to Plaintiffs or the Class, or whether to cover repairs to the same pursuant to an extended

warranty or goodwill program, was a decision made jointly by TMC, TMNA, and TMS.

41. TMS also oversees Toyota's National Warranty Operations (NWO), which, among other things, reviews and analyzes warranty data submitted by Toyota's dealerships and authorized technicians in order to identify defect trends in vehicles. Upon information and belief, TMS dictates that when a repair is made under warranty (or warranty coverage is requested), authorized dealerships must provide Defendants with detailed documentation of the problem and the fix that describes the complaint, cause, and correction, and also retain the broken part in the event Defendants audit the dealership. NWO collects this information, makes it available to other Toyota divisions, and assists Toyota in determining whether particular repairs—such as those made to Plaintiffs and the Class's coolant bypass valves—are covered by an applicable Toyota warranty or are indicative of a pervasive defect.

42. Toyota also jointly designs, determines the substance of, and affixes to its vehicles the window stickers visible on every new Toyota vehicle offered for sale at its authorized dealerships, including those omitting mention of the Defect and reviewed by Plaintiffs and the Class prior to purchasing Class Vehicles. Toyota controls the content of these window stickers; its authorized dealerships have no input with respect to their content. Vehicle manufacturers like Toyota are legally required to affix a window sticker to every vehicle offered for sale in the United States pursuant to the Automobile Information Disclosure Act of 1958, 15 U.S.C. §§ 1231-1233, *et seq.* The Act specifically prohibits the removal or alteration of the sticker by anyone other than the ultimate purchaser prior to the sale of the car, including the dealership at which the vehicle is offered for sale.

43. Toyota developed the marketing materials to which Plaintiffs and the Class were exposed, including owner's manuals, informational brochures, warranty booklets and information included in maintenance recommendations and/or schedules for the Class Vehicles, all of which fail to disclose the Defect.

44. Toyota also employs a Customer Experience Center, known as Toyota Brand Engagement Center, the representatives of which are responsible for fielding customer complaints and monitoring customer complaints posted to Toyota or third-party web sites: data

1 which informs NWO's operations, and through which Toyota acquires knowledge of defect
2 trends in its vehicles.

3 **IV. TOLLING OF STATUTES OF LIMITATIONS**

4 45. Any applicable statute(s) of limitations have been tolled by Defendants'
5 knowing and active concealment and denial of the facts alleged herein. Plaintiffs and members
6 of the Class could not have reasonably discovered the true, latent nature of the Defect until
7 shortly before this class action litigation was commenced.

8 46. In addition, even after Plaintiffs and Class members contacted Toyota and/or its
9 authorized dealers regarding the Defect, they were routinely informed that the Class Vehicles
10 were not defective.

11 47. Defendants were and remain under a continuing duty to disclose to Plaintiffs and
12 members of the Class the true character, quality, and nature of Class Vehicles, that the Defect
13 is the result of poor manufacturing processes, workmanship and/or design, that it will require
14 costly repairs, and that it diminishes the resale value of the Class Vehicles. As a result of
15 Defendants' active concealment, any and all statutes of limitations otherwise applicable to the
16 allegations herein have been tolled.

17 **V. FACTUAL ALLEGATIONS**

18 48. Toyota is the world's second-largest automotive manufacturer and sells its
19 vehicles across the United States through a network of nearly 1,500 dealers, including in
20 California.

21 49. Toyota brands itself as the maker of functional, reliable, and safe vehicles and
22 spends millions of dollars on extensive marketing and advertising campaigns to convey that
23 brand to consumers.³

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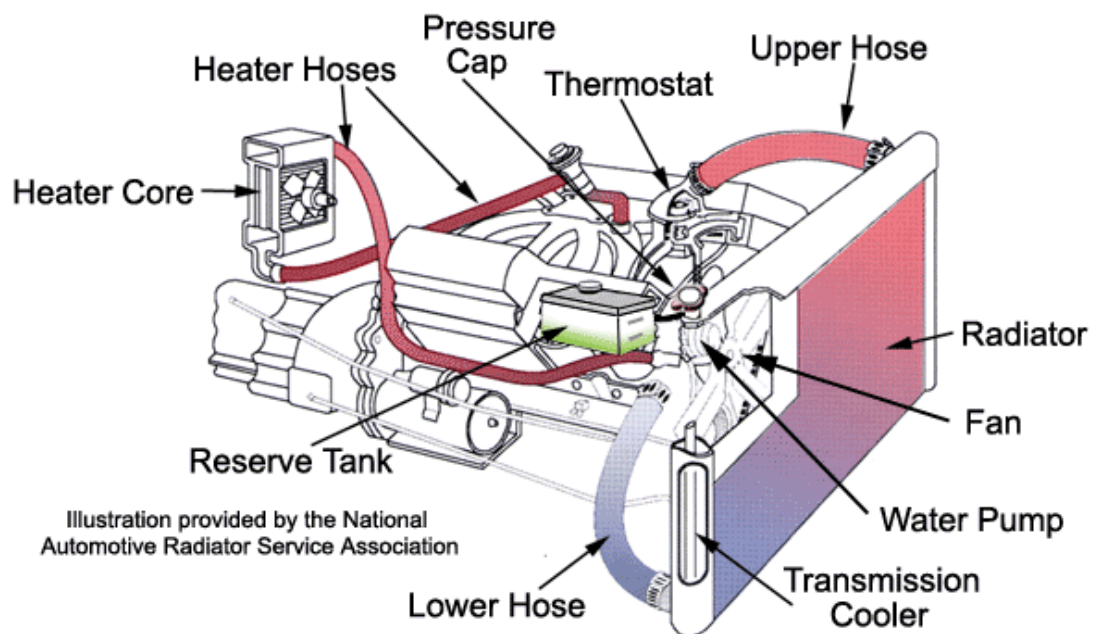
26 _____
27 ³ <https://www.toyota.com/usa/our-story/> (last visited May 31, 2024);
28 <https://www.statista.com/statistics/261539/toyotas-advertising-spending-in-the-us/#:~:text=In%202022%2C%20Japanese%20car%20manufacturer,in%20the%20U.S.%20that%20year> (last visited May 31, 2024).

A. The Coolant Bypass Valve in the Class Vehicles

50. All modern-day automobiles with internal combustion engines utilize a liquid coolant system in order to regulate the temperature of the engine.

51. As the engine starts and begins to run, the engine generates heat. As the heat builds in the engine, the thermostat within the cooling system then begins to open. Once the thermostat has opened, the water pump starts by taking coolant from the radiator and moving it through the engine block and associated components. As the coolant flows through the engine coolant passages, it absorbs heat from the engine, thereby allowing the engine to operate at its optimal temperature and avoid overheating. The coolant then returns back to the radiator, where it is cooled and then can be cycled through the Class Vehicle's engine again.

A diagram depicting the general flow of engine coolant is included below:



52. The coolant system in the Class Vehicles is a “closed loop” system, which means that the coolant flows throughout the system and is not appreciably consumed in the process. In other words, the coolant levels will only appreciably reduce if the system develops a leak. Once a leak develops, the coolant level will steadily reduce until the source of the leak is identified and repaired and the coolant levels are refilled.

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53. The Class Vehicles incorporate a coolant bypass valve, which helps to direct the flow of coolant through the engine. When the engine is warming up, the coolant bypass valve directs the flow of coolant to circulate throughout the engine block instead of cycling back to the radiator, which helps the engine to reach its optimal operating temperature. This is important for achieving optimal gas mileage and emissions output.

54. Ensuring the engines reach optimal operating temperature quickly has a direct impact on the emissions produced by the Class Vehicles. An engine operating at its optimal temperature will be more efficient and produce fewer emissions compared to a colder engine. As such, reducing the time it takes for the Class Vehicle to warm up is essential for the Class Vehicles to reach their advertised emission targets.

55. Engine efficiency is also impacted by coolant flow and optimal operating temperatures. A cold engine will combust less fuel, leading to reduced fuel efficiency. An engine at its optimal operating temperature will conversely combust fuel more completely and efficiency, resulting in improved fuel efficiency. Thus, ensuring the engine reaches its optimal operating temperature is also essential for the Class Vehicles to reach their fuel efficiency (i.e. miles-per-gallon) targets.

56. After the engine reaches its optimal operating temperature, the coolant bypass valve allows more coolant to flow through the radiator in order to maintain the optimal engine temperature, or to the passenger cabin to provide additional heating.

57. If the coolant bypass valve is not functioning properly, it will not be able to direct engine coolant to the parts of the engine that need it the most. If the engine starts to overheat, the coolant bypass valve will direct more coolant to the radiator to ensure the engine does not overheat. If the engine overheats, it can cause excessive wear to the engine components and lead to catastrophic engine failure.

58. Upon information and belief, the Class Vehicles used substantially similar, if not identical, coolant bypass valves, as evidenced by the common coolant bypass valve part number 16671-F2020 used in both models of the Class Vehicles.

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B. The Coolant Bypass Valve Defect

59. The coolant bypass valves within the Class Vehicles suffer from a design and/or manufacturing Defect that ultimately results in the coolant bypass valves failing to perform as intended.

60. Upon information and belief, the source of the Defect is an insufficiently manufactured and/or designed coolant bypass valve that cracks and leaks coolant. Once coolant beings leaking, it comes into contact with the electrical connector located near the valve. The coolant corrodes and damages the connector, which eventually causes connector to malfunction. This causes the coolant bypass valve to be stuck in the “open” or “closed” position (i.e. it no longer responds to the needs of the engine), restricting coolant flow and allowing the engine to overheat.

61. As a result of the coolant leak and damage to the electrical connector, the engine can no longer communicate with the coolant bypass valve while the vehicle is being operated. Thus, the coolant bypass valve cannot redirect engine coolant to the radiator to help cool the engine during operation, which can cause the engine to overheat and damage the engine components.

62. In addition, and as described above, the coolant system in the Class Vehicles is a closed-loop system. The refrigerant in the cooling system should not be appreciably reduced unless the system develops a leak. If a leak develops, the refrigerant will exit the closed-loop and eventually deactivate the system entirely because without refrigerant, it cannot operate as intended.

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63. When the Defect manifests, it also causes a message to appear on the dashboard over the speedometer, which states: “Engine Maintenance Required” and “Visit Your Dealer.” The message cannot be dismissed or otherwise removed from the dash of the Class Vehicle by the operator of the Class vehicle, and instead must be brought to a dealership or to a mechanic. The message is distracting and obscures a significant portion of the speedometer. An image depicting the message is included below:



64. Consumers have also reported that the “Engine Maintenance Requirement” message blocks other important, safety-related messages that are intended to display in the same area of the dash occupied by the message.

65. When the engine overheats because of the Defect, it can cause the Class Vehicles to stall and strand the operator of the Class Vehicle, leaving him or her stuck in a potentially unsafe location and require them to call (and pay) for a tow to the nearest dealership or mechanic to diagnose the Defect.

66. Had Toyota disclosed the existence of the Defect, Plaintiffs and the Class would not have purchased their Class Vehicles, or would have paid substantially less for them.

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C. Toyota's Knowledge of the Defect

67. Upon information and belief, Defendants regularly monitor the NHTSA databases as part of their ongoing obligation to identify potential defects in their vehicles. Examples of the complaints about Class Vehicles can be found below. The below sources establish that Defendants knew, or should have known, of the Defect based on publicly available information through (1) Defendants' own records of customers' complaints, (2) dealership repair records, (3) records from NHTSA, (4) warranty and post-warranty claims, (5) pre-sale durability testing and part sales, and (6) other various sources.

1. Defendants' Pre-Sale Testing and Quality Control Measures

68. Defendants perform rigorous product testing prior to releasing their vehicles to confirm, among other things, the vehicle's compliance with specification representations and marketing materials they intend to provide to the public, as well as compliance with state and federal regulations.

69. Defendants emphasize "total quality management" throughout the entire manufacturing process. Toyota further claims that it uses the "highest quality materials" and ensures that every vehicle meets "rigorous standards before it reaches the market".⁴

70. Defendants attribute their purported success to their testing methods and criteria.⁵ Toyota states that it conducts comprehensive and extensive testing and validation processes.⁶ In 2016 alone, Toyota invested over \$1.2 billion in engineering design and development and manufacturing.⁷ Upon information and belief, Toyota's product testing include testing of the coolant system and coolant bypass valve in the Class Vehicles.

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⁴ <https://www.longotoyota.com/blogs/4337/what-makes-toyotas-so-reliable/> (last visited May 31, 2024).

⁵ <https://www.maplewoodtoyota.com/research/new-car-testing.htm#:~:text=Toyota%20randomly%20selects%20completed%20engines,%2C%20pistons%2C%20valves%20and%20camshafts> (last visited May 31, 2024).

⁶ <https://www.longotoyota.com/blogs/4337/what-makes-toyotas-so-reliable/> (last visited May 31, 2024).

⁷ <https://pressroom.toyota.com/toyota-us-operations-2016-brochure/> (last visited May 31, 2024).

71. Through their quality control measures, Defendants knew or should have known of the Defect described herein, yet have and continue to omit information surrounding the Defect to the Class.

2. Toyota's T-TT-0699-22

72. On July 8, 2022, Toyota issued Tech Tip T-TT-0699-22, titled "Engine Maintenance Required Message – Scan for DTCs." *See* Exhibit 1.

73. The Tech Tip was issued for the "Engine/Hybrid System" and specifically relates to "Cooling" in the Class Vehicles, as well as additional Toyota vehicles.

74. The Tech Tip observes that the Class Vehicles "may display the following message 'Engine Maintenance Required Visit Your Dealer' on the combination meter." In instructs the dealer to check for "DTCs" which refers to diagnostic trouble codes.

75. If the dealership identifies a DTC, it instructs them to "Proceed with the repair recommended in the repair manual for the DTC." The Tech Tip does not alter the existing warranties or provide for free repairs for the Defect.

76. The Tech Tip is a document only issued to authorized Toyota dealerships and is not provided directly to consumers, including owners and lessees of the Class Vehicles.

77. Upon information and belief, Tech Tips are issued only after a significant number of customer complaints or dealership complaints are received by Toyota. In response, Toyota creates a document that it disseminates directly to its authorized dealership in order to provide them with guidance on how to diagnose and remedy common complaints. Given that the Class Vehicles were first available for purchase in late 2018 and the Tech Tip was issued in July of 2022, Toyota likely received scores of complaints from dealers and consumers alike regarding the Defect, and it issued the Tech Tip as a result.

3. Complaints by Other Class Members

78. Plaintiffs' experiences are by no means isolated or outlying occurrences.

79. All vehicle manufacturers, including Defendants, are legally obligated to routinely monitor and analyze NHTSA complaints in order to determine whether vehicles or automotive components should be recalled due to safety concerns, and Defendants thus have

1 knowledge of any and all NHTSA complaints. See TREAD Act, Pub. L. No. 106-414, 114
2 Stat. 1800 (2000).

3 80. The following is just a small sampling of the many complaints submitted to
4 NHTSA by Class Vehicle owners. These publicly available complaints evidence Defendants'
5 knowledge of the Defect, the negative experiences encountered by Class Members, and the
6 financial burden this places on them:⁸

7 **RAV 4 Complaints**

8 **NHTSA ID Number:** 11470772

9 **Incident Date** May 27, 2022

10 **Complaint Date** June 23, 2022

11 **Vehicle Identification Number** 2T3FLRFV9KC****

12 **Summary of Complaint**

13 Maintenance requires message appeared. Coolant bypass valve/tube needs
14 replacement. 2 Days from the end of factory warranty.

15 **NHTSA ID Number:** 11472240

16 **Incident Date** June 15, 2022

17 **Complaint Date** July 3, 2022

18 **Vehicle Identification Number** 2T3W1RFV3KC****

19 **Summary of Complaint**

20 I got a "Engine Maintenance Required" warning message. I check with the dealer, the
21 dealer inspected and told about a faulty coolant bypass valve which the dealership told
22 us a common problem for Toyota RAV4 model year 2019,2020,2021. The dealer told
23 to always check if the engine temperature is shooting. They asked me to order the part
24 and it took close to a week to get the part and then to replace it. A faulty coolant
25 bypass valve risked my vehicle of a failure of the cooling system and so the engine. I
26 had to pay \$126.25 for the part and \$658.08 labor charge to replace the part. Since it is
27 a common problem the manufacturer has to recall and replace the faulty part and pay
28 the cost of the part and labor for replacing the faulty part.

NHTSA ID Number: 11517025

Incident Date April 10, 2023

Complaint Date April 14, 2023

Vehicle Identification Number 2T3P1RFV8LW****

Summary of Complaint

The contact owns a 2020 Toyota Rav4. The contact stated that soon after he had the
vehicle serviced at the dealer, the "engine maintenance required" message was
displayed. The contact stated that the warning advisory remained displayed, which
rendered the speedometer unviewable. The vehicle was taken back to the dealer and
was diagnosed with a defective coolant bypass valve. The manufacturer was notified of
the failure, and the contact was informed that the vehicle was not under recall. The
vehicle was not repaired and remained in the possession of the dealer. The parts to
repair the vehicle was on backorder. The failure mileage was approximately 66,000.

⁸ The following complaints are reproduced as they appear online. Any typographical errors are attributable to the original author.

NHTSA ID Number: 11517011

Incident Date April 14, 2023

Complaint Date April 14, 2023

Vehicle Identification Number 2T3W1RFV9LW****

Summary of Complaint

At about 51,000 miles the engine maintenance required light came on. After taking it to the dealership I found out it was the coolant bypass valve.

NHTSA ID Number: 11518403

Incident Date April 22, 2023

Complaint Date April 22, 2023

Vehicle Identification Number 2T3C1RFVXLW****

Summary of Complaint

I took my vehicle to the dealership (Doral Toyota) on 22-Apr-23 and spoke to Mr. Rafael Sanchez (title: Toyota Advisor) because the "Engine Maintenance Required" light went off. Mr. Sanchez verified the vehicle and confirmed that the "Engine Coolant Bypass Valve" was defective but he stated that there are 597 other owners also waiting for the same part. They were not able to resolve the issue and no estimated time to get the part.

NHTSA ID Number: 11519961

Incident Date April 29, 2023

Complaint Date May 2, 2023

Vehicle Identification Number 2T3H1RFV5LC****

Summary of Complaint

Engine maintenance required notification came on. Car is only 3 years old. Dealership stated that the coolant bypass valve needs to be replaced and it could potentially cause a fire. Service professional at the dealership stated that this is a common issue and most of the time Toyota warranty doesn't want to repair it, also said that it should be recalled. I have also seen hundreds of people complain about this on Rav4 forums.

NHTSA ID Number: 11521078

Incident Date May 8, 2023

Complaint Date May 8, 2023

Vehicle Identification Number 2T3C1RFV5KW****

Summary of Complaint

The Coolant Bypass Valve went bad, and apparently it's been happening frequently to a lot of peoples Toyotas. Also unsafe because I have to wait for the part, which is on back order, because so many of them are faulty. This need to me recalled!

NHTSA ID Number: 11522469

Incident Date May 17, 2023

Complaint Date May 17, 2023

Vehicle Identification Number 2T3C1RFV7KC****

Summary of Complaint

2019 Toyota Rav4 Premium Engine Maintenance light visit dealer popped up on the vehicle. Researching online apparently the coolant bypass valve malfunctioning is a recurring issue with the 2019 Toyota Rav4, not sure why a recall has not been done yet for this vehicle. Went to the dealer to have the vehicle looked at, before having it diagnosed the service person stated it is probably the coolant bypass valve and that the part is on back order, vehicle was put on the machine to have it diagnosed and confirmed that the Coolant Bypass Valve will need to be replaced. The only warning light that it gave me was Engine Maintenance light came on. The service advisor said the vehicle is perfectly fine to drive till they get the part in, which still concerns me because of the engine. I am having to pay out of pocket to get it repaired but after talking

to the service people and researching online from other people, there really should be a recall for the Coolant Bypass Valve.

NHTSA ID Number: 11523247

Incident Date May 22, 2023

Complaint Date May 22, 2023

Vehicle Identification Number 2T3H1RFV9LW****

Summary of Complaint

The contact owns a 2020 Toyota Rav4. The contact stated that after starting the vehicle, the check engine warning light illuminated. The vehicle was taken to an independent mechanic, where a failure code was retrieved for an engine coolant bypass valve circuit short, and it was diagnosed that the bypass hose and valve needed to be replaced. The local dealer was made aware of the failure; however, the vehicle was not repaired. The contact referenced the failure to NHTSA Campaign Number: 20V064000 (Engine and Engine Cooling). The manufacturer was made aware of the failure. The approximate failure mileage was 30,000.

NHTSA ID Number: 11526457

Incident Date May 13, 2023

Complaint Date June 11, 2023

Vehicle Identification Number 2T3W1RFV2KW****

Summary of Complaint

On May 13, 2023, 'Engine Maintenance Required-Visit Your Dealer' warning appeared on my console. I immediately brought the vehicle to the Toyota dealer. I was told the Coolant Bypass Valve went bad. This was at roughly 45,000 miles. I had previously purchased a 'No deductible extended warranty' from this same Toyota dealer. Now they tell me this 'Valve' is not covered under warranty. I was charged \$887.99 for repair of this 'Valve'. As this could cause the engine to overheat, causing additional damage, it most certainly is a safety issue.

NHTSA ID Number: 11527763

Incident Date June 19, 2023

Complaint Date June 16, 2023

Vehicle Identification Number 2T3J1RFV6KC****

Summary of Complaint

Engine maintenance required light came on. Vehicle was diagnosed with needing a new coolant bypass valve. Researching online and in Toyota groups, this is a widespread issue. Even the dealer said they have had many of these repairs yet Toyota has not issued a recall. This is a repair with a cost of \$500-\$1000 and a safety concern but Toyota has not addressed it.

NHTSA ID Number: 11528349

Incident Date June 21, 2023

Complaint Date June 22, 2023

Vehicle Identification Number 2T3W1RFV0LW****

Summary of Complaint

Per my research and talking with dealerships, the coolant bypass valve on this generation of RAV4's is a known issue at 45,000 miles. Many users online and the dealership report seen many cars experiencing the same issue but it's not currently under recall and would be a \$1300 fix right now to drive my car safely without blowing up the engine.

NHTSA ID Number: 11529429

Incident Date June 25, 2023

Complaint Date June 28, 2023

Vehicle Identification Number 2T3W1RFV4LC****

Summary of Complaint

The Coolant Bypass Valve failed for my RAV4 at 59,210 miles. This was confirmed to me by Hoover Toyota. The part has not been inspected by the manufacture, police, insurance representatives, or any others. I had a message appear at 59,202 miles on my dashboard screen that said, "Engine Maintenance Required." I have already gotten Hoover Toyota to fix my part. My concern comes in part that reading through online forums, it appears this is a very regular/common problem for RAV4s (2019-2022) and seems to happen between 45,000 - 65,000 miles. If this is a known issue, I am curious as to why Toyota has not recalled this part since you wouldn't expect a car under 5 years old and driven less than 100,000 miles to have this kind of problem.

NHTSA ID Number: 11530087

Incident Date June 5, 2023

Complaint Date July 3, 2023

Vehicle Identification Number 2T3H1RFV6LC****

Summary of Complaint

Only 46,000 miles and needing a Coolant Bypass Valve replacement

NHTSA ID Number: 11530286

Incident Date July 3, 2023

Complaint Date July 4, 2023

Vehicle Identification Number 2T3W1RFV4NW****

Summary of Complaint

The Engine Coolant Bypass Valve is a known issue across the 2019-Present RAV4 generation. We have taken our RAV4 to the dealership numerous time for the "Maintenance Required Soon" message that comes up when the car starts. The dealer always says that is is just a reminder for us to get our vehicle serviced at 20,000. The service interval message is supposed to only come on at every 5,000, not every 3,000. We took it by our local auto parts store, and the man that works there has a 2019 RAV4 that has the same problem. They had to take theirs to the dealer and have the Coolant Bypass Valve replaced. If not addressed soon, it could cause the engine to overheat. The man at the auto parts store said it doesn't hurt to drive it but it is best not to prolong it. There needs to be an investigation of a recall started on this, as it can be a very confusing situation. It makes people think the car is just reminding you of your service maintenance interval. But this is not what this message means. When you take it to the dealer, they are clueless and they will give you the runaround. [XXX] of Pell City, Alabama. 2022 Toyota RAV4 XLE purchased from Serra Toyota of Birmingham
 INFORMATION Redacted PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6).

NHTSA ID Number: 11530434

Incident Date June 28, 2023

Complaint Date July 5, 2023

Vehicle Identification Number 2T3W1RFV8LW****

Summary of Complaint

The coolant bypass valve failed. If this was not repaired it could have resulted in leaking coolant which would eventually cause engine failure. The issue started with a message on the dash stating there was "engine maintenance required" on 6/28/2023. I took my vehicle to my service provider the next day, 06/29/2023. The dealer service tech knew exactly what the issue was before diagnostics because they had 4 RAV4's come in that week with this same issue. The bypass valve was replaced on this visit and I paid for the job. I have since seen many posts online with this same failure on 2019 and 2020 RAV4 models. It appears Toyota had a recall for this in 2020 for Hybrid

RAV4's and some non hybrid RAV4's but apparently my vehicle and many others were not included in this recall. https://www.greencarreports.com/news/1127163_some-2019-2020-toyota-and-lexus-hybrids-recalled-for-coolant-leak-concern This recall needs to be extended for the other vehicles like mine that are currently being affected by this faulty part.

NHTSA ID Number: 11531396
Incident Date July 10, 2023
Complaint Date July 10, 2023
Vehicle Identification Number 2T3J1RFV0LC****
Summary of Complaint

Coolant bypass valve required replacement due to faulty equipment, causing sensor to read "engine maintenance required". Costs \$650 to replace and dealership will not cover in warranty or admit fault. Many other Rav 4 owners are having same issue. This should not be on the customer, but rather Toyota for having faulty equipment in vehicle. Also "engine maintenance required" sensor will not go away. Since this is not an engine issue, this is unsafe, false alarming.

NHTSA ID Number: 11531381
Incident Date January 30, 2023
Complaint Date July 10, 2023
Vehicle Identification Number 2T3W1RFV8LC****
Summary of Complaint

Coolant Bypass Valve breaks easily and in many RAV4s and Corollas. When this happens an "Engine Maintenance Required" see your dealer message comes up in the heads up display and won't go away. Makes seeing the important details of speed, miles to empty, etc on the screen impossible read. It is a known issue by Toyota and they refuse to do a recall.

NHTSA ID Number: 11531562
Incident Date July 10, 2023
Complaint Date July 11, 2023
Vehicle Identification Number 2T3P1RFV2LC****
Summary of Complaint

Car has 26K miles on it (3 year 2 months old). A light appears saying Emergency Engine Maintenance is required. After research as this error is not in manual, found out it was a failed coolant bypass valve and this was a common failure/faulty equipment but we are being asked to pay full price to repair. A simple internet search shows 100's of consumers with same issue in same model and low miles.

NHTSA ID Number: 11531798
Incident Date June 15, 2023
Complaint Date July 12, 2023
Vehicle Identification Number 2T3W1RFV4LC****
Summary of Complaint

Dash reported "Engine Maintenance Required / Visit Dealer" - dealer said it was a "coolant bypass hose", not covered by any warranty. \$100 part but engine-out procedure costs \$800. This vehicle has less than 40,000 miles.

NHTSA ID Number: 11532327
Incident Date June 15, 2023
Complaint Date July 14, 2023
Vehicle Identification Number 2T3P1RFV0LW****
Summary of Complaint

At approximately 60K on my 2020 Toyota Rav4 XLE The Engine Maintenance Required Visit Your Dealer message came on my dash. It's been a known issue for many Rav4's not to mention other Toyota models for the engine coolant bypass switch to have gone bad. The vehicle is available for inspection upon request. My safety and whom I may be transporting can be put at risk if the engine refuses to start or operate as normal and can leave us stranded. The problem is known by Toyota and many of these valves have been replaced at the dealer for a very high cost.

NHTSA ID Number: 11532312

Incident Date July 1, 2023

Complaint Date July 14, 2023

Vehicle Identification Number 2T3W1RFV7LW****

Summary of Complaint

2020 Toyota Rav4, just around 25K miles, took to dealership to get regular maintenance service, (oil change, tire rotation). After a couple days, "engine maintenance required" message pops up. Plugged in code reader and brings up code "P268115" for "Engine Coolant Bypass Valve Circuit Short to Battery or Open". This issue is popping up for many recent year Toyota models (Rav4, Camry, Corolla) and is not being repaired by Toyota for free. They are charging \$600 - \$1000 to repair faulty part that is not the owner's fault and issue needs to be recalled.

NHTSA ID Number: 11532309

Incident Date July 1, 2023

Complaint Date July 14, 2023

Vehicle Identification Number JTMP1RFV7KD****

Summary of Complaint

Getting the following issue: 2019 RAV4 : P268115 Engine Coolant Bypass valve circuit short to battery or open This is happening to a lot of other cars - it seems like Toyota has a faulty coolant valve

NHTSA ID Number: 11532631

Incident Date June 21, 2023

Complaint Date July 17, 2023

Vehicle Identification Number 2T3H1RFV4KC****

Summary of Complaint

Engine maintenance required visit your dealer alert on screen. Seems to happen when the A/C is in use. Took it to a Toyota dealership for a diagnostic test and they said it was the Engine coolant bypass valve. The diagnostic test was \$180. They mentioned the part was on backorder and I have been waiting for the part for a month now. The alert will not go away at all if the A/C is in use. The dealership mentioned this has been happening frequently with RAV 4s. It will cost approximately \$771 to repair and \$189 for a coolant flush.

NHTSA ID Number: 11533789

Incident Date July 7, 2023

Complaint Date July 22, 2023

Vehicle Identification Number 2T3W1RFV9KW****

Summary of Complaint

"Engine maintenance required - see dealer" message around 60k miles and subsequent coolant bypass valve issue should be a RECALL for 2019 RAV4s. Toyota either deliberately enabled this message to pop up to require vehicle owners to spend over \$600 at Toyota dealerships, installed faulty coolant bypass valves, and/or failed to properly code messages in the vehicles. The message will not go away and requires only Toyota to disable it. Thousands of owners have had to take their vehicles into

Toyota dealerships to correct the message and/or valve issue, costing at least \$600. For these reasons, this should be a RECALL.

NHTSA ID Number: 11533903

Incident Date July 21, 2023

Complaint Date July 23, 2023

Vehicle Identification Number 2T3W1RFV1LC****

Summary of Complaint

Coolant Bypass Valve Replacement required on my 2020 Rav 4. I have 33,000 miles & purchased in 2019, so it is not covered under warranty. The dealer is charging me over \$850 to replace. I have been told by the Dealer that this is a "KNOWN" problem with this and other Toyota models. Why is there not a recall or extended warranty on this repair if so many owners are paying hundreds of dollars on relatively newer cars with the same FAULTY PRODUCT? I would like Toyota to reimburse me. I am having the car repaired tomorrow because I have been told it is dangerous to use the vehicle in this condition. Please assist me with ways to get reimbursed from Toyota and for others to receive repairs at no cost, especially on vehicles under 5 or 6 yrs old. thank you.

NHTSA ID Number: 11534056

Incident Date July 21, 2023

Complaint Date July 24, 2023

Vehicle Identification Number 2T3J1RFV4KC****

Summary of Complaint

Warning Engine Maintenance light popped up on 2019 RAV4 Adventure, with notification to see dealership. Took vehicle in and was informed that the coolant bypass valve has internal circuit failure. Vehicle has has 23,000 miles, this should not be happening to a relatively new car. Appears to be a widespread defect per the Internet: [XXX] [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11534354

Incident Date July 25, 2023

Complaint Date July 25, 2023

Vehicle Identification Number 2T3C1RFV3KC****

Summary of Complaint

2019 Vehicle with less than 45K miles Got a message to take the car to the dealership. Dealership tells me that the coolant bypass valve needs to be replaced. Dealership representative tells me this is a common issue with cars like mine and the part is back ordered for an indeterminate amount of time. After doing some research, I see this is a major issue with quite a few Toyota models, not just Rav4.

NHTSA ID Number: 11534608

Incident Date July 23, 2023

Complaint Date July 26, 2023

Vehicle Identification Number 2T3J1RFV6LC****

Summary of Complaint

The coolant bypass valve is defective on a 3 year old single owner, well maintained under 50,000 miles vehicle. This is a wide spread and known issue for Toyota which can result in engine overheating, causing potentially unsafe situations to occur for the driver. This can also severely damage the engine.

NHTSA ID Number: 11535103

Incident Date May 9, 2023

Complaint Date July 28, 2023

Vehicle Identification Number 2T3P1RFV1LC****

Summary of Complaint

Coolant Bypass Valve failure/malfunction. Frequently reported issue for model/year.

NHTSA ID Number: 11535231

Incident Date June 26, 2023

Complaint Date July 29, 2023

Vehicle Identification Number 2T3K1RFV3KC****

Summary of Complaint

Vehicle had been in for routine maintenance 6 weeks prior. Around 46k miles, the check engine light came on requiring me to bring it back to the Toyota dealer. I wasn't able to bring it to the dealer for about 6 days after it came on due to appointment availability. Once I brought it in, they told me the coolant bypass valve had a circuit short and needed to be replaced. This part was replaced and is unable to be inspected. This is a safety issue especially during the summer as this short could cause the engine to overheat.

NHTSA ID Number: 11535175

Incident Date October 18, 2023

Complaint Date July 29, 2023

Vehicle Identification Number 2T3F1RFV1LC****

Summary of Complaint

The vehicle has a message engine maintenance required. The Toyota dealership diagnostic was that the coolant bypass valve needed to be replaced. The dealer told us they are getting at least 6 Rav4 a week coming in with the same issue. The part replacement isn't covered manufacturer under warranty. This needs to be a recalled part.

NHTSA ID Number: 11535806

Incident Date July 27, 2023

Complaint Date August 1, 2023

Vehicle Identification Number 2T3W1RFV6KC****

Summary of Complaint

Engine maintenance notification came on and car was taken in for diagnosis. It seem the coolant bypass valve was the issue and this seems to be an issue for Camry's, Corrolas, and the RAV4s. Toyota wanted to charge an outrageous amount to fix this when it is a known issue across the board and is widely talked about online through research.

NHTSA ID Number: 11536047

Incident Date August 2, 2023

Complaint Date August 2, 2023

Vehicle Identification Number 2T3W1RFV6LW****

Summary of Complaint

Coolant bypass valve just gave out on car was informed by dealership that this is an ongoing problem with my make of car.

NHTSA ID Number: 11536614

Incident Date August 4, 2023

Complaint Date August 4, 2023

Vehicle Identification Number JTMA1RFV5KJ****

Summary of Complaint

Check engine light on for coolant bypass valve, apparently car is over heating ?

NHTSA ID Number: 11536648

Incident Date August 4, 2023

Complaint Date August 5, 2023

NYE, STIRLING, HALE, MILLER & SWEET
33 WEST MISSION STREET, SUITE 201
SANTA BARBARA, CALIFORNIA 93101

Vehicle Identification Number 2T3H1RFV0KW****

Summary of Complaint

My Engine maintenance notification came on this week and I took my car for diagnosis. It was determined that it is my the coolant bypass valve was the issue and this seems to be an issue for RAV4s. I researched Recalls for this issue and found a recall code 20TA04 for 2019 - 2020 RAV4 Toyota .I currently drive a 2019 RAV4 but this recall doesn't show under my VIN # But I am having the same issue. Its frustrating when this is a known issue that the dealership is aware of but wants charge large sums of money to fix a problem that is not normal wear and tear. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://static.nhtsa.gov/odi/rc1/2020/R CMN-20V064-1370.pdf

NHTSA ID Number: 11536679

Incident Date August 5, 2023

Complaint Date August 2, 2023

Vehicle Identification Number 2T3P1RFV6LC****

Summary of Complaint

There is a known issue with the coolant bypass valve failing. Dealerships are charging over \$600 to fix and many people are having the same issue. The engine maintenance required message is persistent, and will not allow you to bypass it.

NHTSA ID Number: 11536983

Incident Date August 7, 2023

Complaint Date August 7, 2023

Vehicle Identification Number 2T3P1RFV1KC****

Summary of Complaint

“Engine maintenance required - Visit Dealer” warning came on. Vehicle was diagnosed with needing a new coolant bypass valve. Researching online, and in Toyota groups, this is a known and widespread issue. The dealer stated they have had many of these repairs come in, yet Toyota has not issued a recall or TSB. This is a repair costing between \$500-\$1000. That's a healthy sum of money to be spending on a fairly new car.

NHTSA ID Number: 11537282

Incident Date August 7, 2023

Complaint Date August 8, 2023

Vehicle Identification Number 2T3H1RFV4KC****

Summary of Complaint

Coolant bypass valve failure, which can result in Engine overheating or complete seizure, which can endanger passengers in a vehicle. “Engine Maintenance Required “ message shows up on dash and cannot be cleared away. South Bay Toyota rep acknowledged that this has been an issue for model year 2019.

NHTSA ID Number: 11537532

Incident Date July 19, 2023

Complaint Date August 9, 2023

Vehicle Identification Number 2T3C1RFV5LC****

Summary of Complaint

The engine maintenance required light came on at 56,000 miles and would not reset even after a scheduled oil change. The Toyota dealership neglected to evaluate this light when I brought my car in for servicing. After getting a diagnostic, it was found that the coolant bypass valve needed to be replaced which was at least \$600. I was advised that the vehicle was to not be driven long distances as it could result in more damage to the car. This is my 4th expensive repair on this 3 year old car in 1 year. This is my very

first Toyota, & I am extremely disappointed. I bought a Toyota anticipating a low maintenance, high quality vehicle and have had nothing but issues.

NHTSA ID Number: 11537483

Incident Date August 4, 2023

Complaint Date August 9, 2023

Vehicle Identification Number 2T3EWRV9KW****

Summary of Complaint

Vehicle take to dealer to diagnose seatbelt warning buzzer and SRS inoperative light illuminated. The dealer diagnosed the problem as a defective coolant bypass valve. This seems to be a rather common diagnosis. With the air bag system inoperative, I feel insecure driving the car without this important safety system.

NHTSA ID Number: 11537932

Incident Date August 11, 2023

Complaint Date August 11, 2023

Vehicle Identification Number 2T3J1RFV2LC****

Summary of Complaint

A known issue that has been occurring to many people with the coolant bypass valve system going out very soon after purchasing. I bought a 2020 Toyota rav4 and my bypass coolant valve has malfunctioned and needs replaced and of course is outside of the warranty. Per many google searches this is a common issue and should be addressed.

NHTSA ID Number: 11538088

Incident Date August 12, 2023

Complaint Date August 12, 2023

Vehicle Identification Number 2T3W1RFV7LC****

Summary of Complaint

Coolant Bypass valve internal short.

NHTSA ID Number: 11538080

Incident Date July 29, 2023

Complaint Date August 12, 2023

Vehicle Identification Number 2T3C1RFV8KW****

Summary of Complaint

I was driving my 2019 rav 4 and a warning came on my screen that stated “ engine maintenance required. Visit dealer.” No check engine light came on just this warning that would not go away. I went to orileys to see if they could tell me what was wrong and they were unable to read it since it was not a check engine light. The orileys employee told me I had to take it to a Toyota dealership to find out exactly what was wrong with it. I contacted my local dealership and they confirmed that it was a coolant bypass valve that failed and that he has seen this warning pop up on at least 10 Rav 4's and that every time it is the coolant bypass valve that has failed.

NHTSA ID Number: 11538713

Incident Date January 10, 2023

Complaint Date August 15, 2023

Vehicle Identification Number 2T3H1RFV1LW****

Summary of Complaint

The engine maintenance light came on to visit the dealer. It's because of the Coolant Bypass Valve.

NHTSA ID Number: 11539105

Incident Date August 10, 2023

NYE, STIRLING, HALE, MILLER & SWEET
33 WEST MISSION STREET, SUITE 201
SANTA BARBARA, CALIFORNIA 93101

Complaint Date August 17, 2023
Vehicle Identification Number 2T3F1RFV4LC****

Summary of Complaint

Coolant Bypass Valve failure at 41K miles. Confirmed by dealership. "Engine Maintenance" warning light came on before taking to dealership.

NHTSA ID Number: 11539395
Incident Date August 16, 2023
Complaint Date August 18, 2023
Vehicle Identification Number 2T3Y1RFV6LC****

Summary of Complaint

My Engine Maintenance Required light had appeared on dashboard and found out that is my coolant bypass valve that needed to be replaced. had on online, to find that this is a issue with Toyota, that people had to have this replaced. I had purchased my vehicle back in 2021, and just had this issue 2023. I took to the dealership and was told that it was that part. they are replacing the part going through the extended warranty insurance, but this is concerning, that if this OE part has a defect, that once my warranty expires that I will have this problem again and have no way on coverage.

NHTSA ID Number: 11539586
Incident Date August 4, 2023
Complaint Date August 19, 2023
Vehicle Identification Number 4T3EWRV1LU****

Summary of Complaint

My car is leaking coolant and needs a new coolant bypass valve. It seems like it is happening to every rav4 and camry. They put in faulty parts.

NHTSA ID Number: 11539493
Incident Date August 17, 2023
Complaint Date August 19, 2023
Vehicle Identification Number 2T3K1RFV2LC****

Summary of Complaint

I was driving and out of nowhere this warning came on engine maintenance required, and this now a normal maintenance required that means an oil change. The problem with this warning is the coolant bypass valve, and I'm not the only one with this issue, my car has only 32100 miles only, this a ridiculous for a new car. Plus it seem that this issue only comes on with the A/C on

NHTSA ID Number: 11540885
Incident Date August 21, 2023
Complaint Date August 26, 2023
Vehicle Identification Number 2T3P1RFV1KC****

Summary of Complaint

Engine Maintenance Required light came on. Got it checked out by Toyota Dealer and the coolant bypass valve needs to be replaced. It seems to be a common problem with RAV4s.

NHTSA ID Number: 11541255
Incident Date July 28, 2023
Complaint Date August 28, 2023
Vehicle Identification Number 2T3C1RFVXKC****

Summary of Complaint

"Engine Maintenance Required, Visit Your Dealer" warning message pop up on 2019 Toyota Rav4. Then the vehicle was taken to Toyota Dealer which they diagnosed as Coolant Bypass Valve failure. The dealer charged an outrageous amount to replace

that valve with hose assembly. After researching online, this is a widespread issue in 2019 and newer Toyota Rav4.

NHTSA ID Number: 11541186

Incident Date June 1, 2023

Complaint Date August 28, 2023

Vehicle Identification Number 2T3W1RFV4KC****

Summary of Complaint

Engine warning that cannot be cleared - "Engine Maintenance Required" displays on Multi-information display. Coolant Bypass Valve is the problem according to Toyota, and they want \$1000 to fix it. Happens to many right after warranty expires.

NHTSA ID Number: 11541774

Incident Date April 19, 2023

Complaint Date August 30, 2023

Vehicle Identification Number 2T3F1RFV8LC****

Summary of Complaint

Coolant Bypass Valve on my 2020 RAV4. There needs to be a recall; even Toyota dealerships in the Dallas/Fort Worth metroplex say that there needs to be a recall. Service advisors say this is a big problem they see daily and with all cars and at all mileage. The cost to replace the Coolant Bypass Valve in my car = \$855-RIDICULOUS!! In addition, due to the constant "Engine Maintenance Required" message on the screen triggered by the Coolant Bypass Valve needing to be replaced, that can't be removed, all other car related information and/or service issues, is unable to be seen...which is dangerous!! Toyota used to be one of the best car manufacturers for quality and reliability, but now, their quality has tanked...

NHTSA ID Number: 11542095

Incident Date September 1, 2023

Complaint Date September 1, 2023

Vehicle Identification Number 2T3W1RFV2KC****

Summary of Complaint

COOLANT BYPASS VALVE FAILED. APPARENTLY IT IS A COMMON ISSUE WITH THIS VEHICLE.

NHTSA ID Number: 11542436

Incident Date September 1, 2023

Complaint Date September 4, 2023

Vehicle Identification Number 2T3P1RFV8LC****

Summary of Complaint

Toyota engine coolant bypass trouble code. Seems to be wide spread reports amongst customers with newer generation 5 Toyota vehicles. Dealer quotes the 20 minute repair will cost \$700-900 USD & the part itself is on back order due to the increasing failure rate of the part. The faulty part seems to affect the cooling system of the car but due to the increasing amount of reports & failures of the same part, the dealer should be recalling & replacing the part for free rather than billing customers \$700+ dollars. For reference, my vehicle is a model year 2020 & has 19,000 miles & the part has already failed.

NHTSA ID Number: 11542980

Incident Date August 12, 2023

Complaint Date September 6, 2023

Vehicle Identification Number 2T3J1RFVXLC****

Summary of Complaint

NYE, STIRLING, HALE, MILLER & SWEET
33 WEST MISSION STREET, SUITE 201
SANTA BARBARA, CALIFORNIA 93101

This is a common issue for the 5th Generation Rav4. It doesn't read fault codes on the OBD2 scanner, but the ENGINE MAINTENANCE alert continuously comes up because of a faulty coolant bypass hose/valve. Toyota OEM Part # 16260-f0010. This should be a recall. Instead, we are paying out of pocket to get this fixed.

NHTSA ID Number: 11543416

Incident Date September 7, 2023

Complaint Date September 8, 2023

Vehicle Identification Number 2T3P1RFV3KC****

Summary of Complaint

Just received Engine maintenance required message that can not be cleared. I pulled in to my local firestone who looked up the error code p268115. This turns out to be the need to replace a coolant bypass valve and seems to be a pretty common issue with RAV4s but has yet to be on a recall. This can cause the vehicle to stall in traffic and overheat causing a major safety issue. the car is at about 24,000 miles.

NHTSA ID Number: 11543416

Incident Date September 4, 2023

Complaint Date September 9, 2023

Vehicle Identification Number 2T3W1RFV8LC****

Summary of Complaint

In my 2020 Toyota RAV4, a "Engine Maintenance Required: See Dealer" message came onto my dashboard and would not go away when I cleared it. I took it into the dealership, and they stated that they had many RAV4's come in with this same message. They said it was most likely the engine's coolant bypass valve. After diagnosing the problem, the dealership confirmed it was the coolant bypass valve. This was very expensive to fix, and for a car that is just over 3 years old it seems unusual for this to occur so soon and to so many other cars within the same year and time period. This part needs to be recalled and reimbursement should be provided to those who had to pay hundreds of dollars to get this fixed when it is very likely a faulty part.

NHTSA ID Number: 11543747

Incident Date September 2, 2023

Complaint Date September 11, 2023

Vehicle Identification Number 2T3C1RFV7KC****

Summary of Complaint

Engine coolant bypass. Apparently this is a MAJOR, common and CONSISTENT issue that is extremely dangerous! I'm not sure why this hasn't been recalled yet. please please PLEASE provide us with some information

NHTSA ID Number: 11544348

Incident Date September 9, 2023

Complaint Date September 13, 2023

Vehicle Identification Number 2T3H1RFV0LC****

Summary of Complaint

Coolant bypass valve failure my car has less than 50k Dealerships informed me that they fix around 10 a month for that part there is a defect regarding this pump

NHTSA ID Number:

Incident Date September 15, 2023

Complaint Date September 16, 2023

Vehicle Identification Number 2T3G1RFV0KW****

Summary of Complaint

Wide spread issue with "engine coolant bypass valve". This has been going on for a long time and a lot of Toyota rav4 drivers are affected. Engine maintenance required pops up in the middle of the screen unexpectedly while driving which is distracting and

a safety issue. Toyota refuses to take accountability for their faulty valves and issue a recall. Please help with this issue. If you google this, it will show there are so many people affected by this.

NHTSA ID Number: 11545208
Incident Date September 18, 2023
Complaint Date September 18, 2023
Vehicle Identification Number JTMH1RFV1KD****
Summary of Complaint

At 46K miles it pop up out of no where and for no aparent reason engine maintanance required. Took the dealer it was the engine coolant bypass malfunctioning. Car has all maintanance up to date by toyota dealer.

NHTSA ID Number: 11545907
Incident Date September 20, 2023
Complaint Date September 21, 2023
Vehicle Identification Number 2T3H1RFV6LC****
Summary of Complaint

I have a 2020 RAV4 Toyota with 60,000 miles.. I have replaced the car battery 3 times now Toyota has no clue why. The 2nd battery only lasted 8 months and it was a name brand battery (Die Hard).. The engine problem started with a warning light that i could not turn off.. I took my car to Toyota and they told me right off (without checking) it was because of a Coolant Bypass Value, the Toyota service lady said it was her 5th Rav4 this week with the same problem. I checked on line and was surprised how many Rav4 customers were complaining about the same issue so i reported it to you.. Toyota is charging me \$900 to replace.

NHTSA ID Number: 11546203
Incident Date September 20, 2023
Complaint Date September 23, 2023
Vehicle Identification Number 2T3C1RFV6KW****
Summary of Complaint

Coolant Bypass Valve is faulty and is a common problem that is breaking for me.

NHTSA ID Number: 11546681
Incident Date September 26, 2023
Complaint Date September 26, 2023
Vehicle Identification Number 2T3P1RFV5LC****
Summary of Complaint

2020 Toyota RAV4 XLE purchased July of 2020. Just hit 35K miles and an "engine maintenance required" message appeared. The error message would not go away while driving and blocked the entire display screen. There is an issue with the Engine Coolant Bypass Valve that costs \$700-\$1000 to repair. The part and repairs are not covered by the 60,000 power terrain warranty.

NHTSA ID Number: 11546788
Incident Date September 20, 2023
Complaint Date September 27, 2023
Vehicle Identification Number 2T3F1RFV4LC****
Summary of Complaint

ENGINE COOLANT BYPASS VALVE failed internally causing an open circuit.

NHTSA ID Number: 11547135
Incident Date September 25, 2023
Complaint Date September 28, 2023

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Vehicle Identification Number 2T3W1RFV3LC****

Summary of Complaint

My RAV4 doesn't even have 40,000 miles on it. I found out that the coolant bypass system needs to be replaced. After investigating online, I realized that this is a very common problem for RAVs. I believe this should be a recall!

NHTSA ID Number: 11547369

Incident Date September 28, 2023

Complaint Date September 29, 2023

Vehicle Identification Number 2T3H1RFV8KW****

Summary of Complaint

My car has been maintained and cared for routinely yet an engine maintenance light has come on. When I took it to the dealership I was told that I needed to spend \$600 to replace the engine coolant bypass valve. After researching how to change that and what the parts consisted of I found that HUNDREDS of not thousands of people who have 2019-2020 Toyota RAV4's have also experienced this problem. My car only has 90,000 miles on it and this is happening to other RAV4 owners who don't have near as many miles. I would happily pay this if it was just something that happened but after researching and finding out so so many others are experiencing the same problem in the same year model car it is frustrating that there isn't a recall on this part. If over 500 people are experiencing the same issue in the same type of car, that is 100% means for a recall. Thank you.

NHTSA ID Number: 11548247

Incident Date September 18, 2023

Complaint Date October 4, 2023

Vehicle Identification Number 2T3W1RFV8LW****

Summary of Complaint

My Toyota Rav4 2020 had engine maintenance issue drive to dealer alert. I diagnosed the problem and it is the coolant bypass valve that is not working. As I researched, I came to find out that this is a common problem for 2018- 2023 Rav4, Camry, and Corolla. This should be recalled having so many malfunctions on the vehicle.

NHTSA ID Number: 11548862

Incident Date October 6, 2023

Complaint Date October 8, 2023

Vehicle Identification Number 2T3W1RFV5KW****

Summary of Complaint

Engine Coolant Bypass Valve Got Bad At Only 38k Miles. Toyota asked 750\$ for 15min repair. And it common issue with 2019 Toyota's. That part should be recalled and replaced for free!

NHTSA ID Number: 11549279

Incident Date October 3, 2023

Complaint Date October 10, 2023

Vehicle Identification Number 2T3P1RFV3KC****

Summary of Complaint

The Engine Maintenance Alert appears on the screen. Mechanic confirmed it is the coolant bypass valve that has been shorted. Forums from other similar model RAV4 report the same issue at low mileage. This can cause the car to stall at high speeds.

NHTSA ID Number: 11549113

Incident Date October 10, 2023

Complaint Date October 10, 2023

Vehicle Identification Number 2T3W1RFV0KC****

Summary of Complaint

"Engine Maintaince Soon" light continues to go off while driving the car making the dashboard impossible to use. Took the Rav4 to the dealership and said it would be \$536 to replace the coolant bypass valve. It is a know issue on 2019 and newer Rav4 Toyota vehicles and needs to be recalled.

NHTSA ID Number: 11549450

Incident Date September 21, 2023

Complaint Date October 11, 2023

Vehicle Identification Number JTMW1RFV1KJ****

Summary of Complaint

At 41K miles it pop up out of no where and for no aparent reason engine maintainance required. Took the dealer it was the engine coolant bypass malfunctioning. Car has all maintainance up to date by toyota dealer.

NHTSA ID Number: 11549407

Incident Date October 11, 2023

Complaint Date October 11, 2023

Vehicle Identification Number 2T3P1RFV5LC****

Summary of Complaint

Got an engine maintenance required alert, took to Toyota and they advised the coolant bypass valve needs to be replaced at just 38,000 miles. Googled this and found out many 2020 RAV4 with the same issue at just under 40,000 miles. Also a common issue is the voltage being low and we already had to get the battery replaced once and still get alerts of it being low after replacement. Have to pay today \$765 for the coolant bypass to be replaced, will have the receipt later in the day.

NHTSA ID Number: 11549387

Incident Date October 10, 2023

Complaint Date October 11, 2023

Vehicle Identification Number 2T3W1RFV0LC****

Summary of Complaint

I have 2020 Toyota rav4 XLE and all of sudden I got "Engine Maintenance Required" When I turn off the AC, this message goes away but comes in when I turn on the AC. I believe, it is coolant bypass valve which needs to be replaced. I read my forums in [XXX] and [XXX] and many others have complaint about the same. Toyota has to have a recall on this poorly manufactured bypass value. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11549835

Incident Date October 12, 2023

Complaint Date October 13, 2023

Vehicle Identification Number 2T3H1RFV7LC****

Summary of Complaint

RAV4 53,000 miles on and engine maintenance required prompt came on. No other warning lights on dash. Took it to dealership and it was a coolant bypass valve. Read up on it and it's been happening to many more people. Was originally charged \$900 but got a discount ended up being \$825

NHTSA ID Number: 11549804

Incident Date September 1, 2023

Complaint Date October 13, 2023

Vehicle Identification Number 2T3G1RFV4LW****

Summary of Complaint

-Inspection found coolant bypass valve seized recommendation, was to replace coolant hose with bypass valve. YES, the car is available for inspection upon any request - Safety risk unknown if not fixed -Michaels Toyota of Bellevue Washington confirmed on September 23rd 2023. I brought the car in originally on September 9th 2023 for a 10,000 mileage service and oil change. when I called to ask why the engine maintenance notice wouldn't turn off. I was scheduled to bring the car back on September 23, 2023 the needed part was not in stock nor covered by the factory or powertrain warranty with 31,2002 miles on it. The warning light came on at the same time the service and oil change was due. I was stopped a month prior by a random mechanic who noticed the car was leaking abnormal amounts of what he said could be coolant on the passengers front undercarriage. This leaking has been happening for approximately a year and I was not notified the previous 3 times the car had been in for inspections.

NHTSA ID Number: 11549963

Incident Date October 13, 2023

Complaint Date October 14, 2023

Vehicle Identification Number 2T3W1RFV9KC****

Summary of Complaint

2019 RAV4 experienced a check engine light and was overheating due to a faulty Coolant Bypass Valve made by Toyota. If unchecked and not replaced it could cause catastrophic failure to engine due to overheating. Toyota charges between \$600-1100 for replacement and it is not covered under warranty because Toyota claims it is not part of power train. Had to be replaced at dealer who explained that it is a common issue with this vehicle .

NHTSA ID Number: 11550007

Incident Date September 22, 2023

Complaint Date October 15, 2023

Vehicle Identification Number 2T3G1RFV1LW****

Summary of Complaint

Engine maintenance required light came on. Scan code came up engine coolant bypass valve stuck open. Had to replace it. Cost me \$120 for the part with hoses attached.

NHTSA ID Number: 11550293

Incident Date October 16, 2023

Complaint Date October 16, 2023

Vehicle Identification Number 2T3A1RFV0LW****

Summary of Complaint

There was a warning message pop up all the time and I went to Toyota service. They said I need to pay for a coolant bypass valve replacement and it costs approx 600-800 dollars. Also, they did not fill up for the engine oil even it's in very low to dry position.

NHTSA ID Number: 11550514

Incident Date October 16, 2023

Complaint Date October 17, 2023

Vehicle Identification Number 2T3H1RFV5LC****

Summary of Complaint

Part # 16260-f0010 - engine coolant bypass valve failed due to open or internal short and caused a Engine maintenance required warning which blocked other safety items on the display. This is a wide spread and known issue for Toyota which can result in engine overheating due to leaking coolant and result in engine failure (severely damage the engine) leading to engine stall and/or fire risk, causing potentially unsafe situations to occur for the driver and others in the vehicle. The error code is "P268115" for "Engine Coolant Bypass Valve Circuit Short to Battery or Open". Yes. the problem has

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been reported with NHTSA by others and from some dealers. When I took the vehicle into the dealership, and they stated that they had many RAV4's come in with this same message. They immediately said it is some engine component failure. There is a related NHTSA Campaign Number: 20V064000 (Engine and Engine Cooling) and also a recall related to it (but not for my vehicle's VIN): [XXX] Yes, the component has been inspected by the dealer. No, there was no warning lamps, messages or other symptoms of the problem prior to the failure, and when did they first appear Engine maintenance required warning sign did not go off which is good to have warning but blocking other safety items on the display dash board is a safety hazard. This could only be removed if we spend \$185 for diagnostics (which is charged knowingly that this has been a reported/unreported problem around the 2.5-4yr/30-60k miles for the vehicles with this part) and fixing the part at the dealer and resetting the code. The cost of the part is affordable but the labor charge of \$700 is exorbitant. The part replacement isn't covered under manufacturer's warranty. This part warrants recall as this is accidental poor manufacturing issue that is outside the scope of normal wear and tear and especially when the owner is not at fault. I'm expecting more repairs in future. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11551073

Incident Date October 20, 2023

Complaint Date October 20, 2023

Vehicle Identification Number 2T3W1RFV3KC****

Summary of Complaint

Engine light came on for the engine Coolant bypass valve. Common problem. Toyota wants 800\$ to repair.

NHTSA ID Number: 11551118

Incident Date October 20, 2023

Complaint Date October 20, 2023

Vehicle Identification Number 2T3W1RFV0LW****

Summary of Complaint

Unknown engine maintenance light alert check light Recommend engine coolant bypass valve with gallon of coolant

NHTSA ID Number: 11551325

Incident Date October 2, 2023

Complaint Date October 23, 2023

Vehicle Identification Number 2T3H1RFV6LW****

Summary of Complaint

I have a 2020 Toyota RAV4, two weeks ago the following display appear "Engine Maintenance Require, Visit Your Dealer". I attempted to clear it but it cannot be done. I check online for similar issues. I found that the 2019 Toyota RAV4, Camry, Avalon, and Lexus ES300H vehicles have similar issue with the 'coolant bypass valve'. Mine is also a 2.5L 4-Cylinder Engine. I purchase my Rav4 on Feb 24, 2020. My car only has 15,429 miles and a possible fire issue makes me nervous. I also notice than some preselected 2020 RAV4 were added to the recall, but not my RAV. Should I wait till my engine cracks or the cooling system fail?

NHTSA ID Number: 11551648

Incident Date October 23, 2023

Complaint Date October 24, 2023

Vehicle Identification Number 2T3G1RFV1LC****

Summary of Complaint

Engine coolant bypass valve needs to be replaced. Seems to be a very common issue in 2019-2023 RAV4s but Toyota has not issued a recall and is making customers pay \$600-900 to fix. I ask that Toyota take responsibility and issue the recall now so this can be fixed!

NHTSA ID Number: 11551642
Incident Date October 24, 2023
Complaint Date October 24, 2023
Vehicle Identification Number 2T3P1RFV3LC****
Summary of Complaint

2020 Toyota Rav4 - Cooling valve failure reported and is not covered under warranty or recalled. Car only has 35k miles. This is apparently a common issue as the dealer knew the problem before even doing any diagnosis. Once I told them the "Engine Maintenance Required" message was on, they said "Oh, thats usually the coolant bypass valve". If it is that common an issue it should be recalled. Toyota should take ownership of this issue and fix / reimburse people for the problem. [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11551588
Incident Date October 21, 2023
Complaint Date October 24, 2023
Vehicle Identification Number 2T3W1RFV2LC****
Summary of Complaint

Coolant bypass valve shorts out and doesn't open or close to allow coolant through it. "Engine Maintenance Required" message pops up for this. Toyota dealer inspected it and it replacing the part. NOT covered under my warranty.

NHTSA ID Number: 11552224
Incident Date September 5, 2023
Complaint Date October 27, 2023
Vehicle Identification Number 2T3H1RFVXLC****
Summary of Complaint

Engine maintenance light came on and dealership indicates it's the coolant bypass valve. This seems to be a common safety issue being ignored by both Toyota and the transportation safety board...

NHTSA ID Number: 11552760
Incident Date October 30, 2023
Complaint Date October 30, 2023
Vehicle Identification Number 2T3P1RFVXKC****
Summary of Complaint

Engine Maintenance Required light on due to a faulty Coolant Bypass Valve. After doing research online, there are many 2019 and 2020 RAV4 that have been having this problem. The dealer said the same thing. Would like to put this on the record in hopes that a recall will happen in the future.

NHTSA ID Number: 11553268
Incident Date November 2, 2023
Complaint Date November 2, 2023
Vehicle Identification Number 2T3H1RFVXLC****
Summary of Complaint

Coolant Bypass valve has stopped working, which can cause engine issues and forces a message on LED display saying Engine Maintenance Required. Local Toyota technician admitted that they've had 100's of these issues with the Rav4 recently and it costs over \$500 to fix.

NHTSA ID Number: 11553501

Incident Date August 20, 2023

Complaint Date November 3, 2023

Vehicle Identification Number 2T3H1RFV7LC****

Summary of Complaint

My 2020 Toyota RAV4, "Engine Maintenance Required: See Dealer" message came on my dashboard and would not go away when I cleared it. I took it into the dealership, and they stated that they had 1000s of RAV4's come in with this same message. They said it was the engine's coolant bypass valve. After diagnosing the problem, the dealership confirmed it was the coolant bypass valve. This was very expensive to fix, \$926.67, to be exact. For a car that is just over 3 years old, less than 40,000 miles, Toyota knew of these defective parts and still put them in to get the car out of their factory and onto a dealer's lot. They do not care if it kills anybody, just get the car sold. Toyota needs to have this bypass valve as a 'recall' and issue refunds to THEIR loyal customers, so they call us, loyal customers, not sure how much longer I will be a 'loyal' Toyota customer. I addressed this matter with Toyota Motor Sales U.S.A. Inc. and the dealership I purchased my 2020 RAV4, Milton Martin Toyota of Gainesville, GA. They just blew it off. So, I went to another Toyota dealership to have the repair done.

NHTSA ID Number: 11553584

Incident Date November 4, 2023

Complaint Date November 4, 2023

Vehicle Identification Number 2T3P1RFV3LC****

Summary of Complaint

At 68,000 miles my Toyota Rav4 needs to have coolant bypass valve replaced. My understanding is this is getting to be a common problem and would like to see it placed on a RECALL. Thank You.

NHTSA ID Number: 11554989

Incident Date November 3, 2023

Complaint Date November 14, 2023

Vehicle Identification Number 2T3H1RFV5LW****

Summary of Complaint

engine coolant bypass valve short to battery

NHTSA ID Number: 11554983

Incident Date November 12, 2023

Complaint Date November 14, 2023

Vehicle Identification Number 2T3W1RFV7LW****

Summary of Complaint

Engine maintenance required signed popped on and wouldn't go away. Took it to the dealership. They say it's a common coolant bypass valve. Was charged a hefty amount of nearly \$700

NHTSA ID Number: 11555738

Incident Date November 15, 2023

Complaint Date November 17, 2023

Vehicle Identification Number 2T3J1RFV9KC****

Summary of Complaint

My car ran a message of "Maintenance engine required" and it turns out the COOLANT BYPASS VALVE has gone bad. When turning the AC on the message appears, but went off the message doesn't appear.

NHTSA ID Number: 11555878

Incident Date July 13, 2023

Complaint Date November 19, 2023

Vehicle Identification Number 2T3W1RFV1KW****

Summary of Complaint

In my Rav4, I had a message pop up that said "Engine Maintenance Required" and it wouldn't go away. I couldn't get rid of it. So I took it to the dealership and they immediately said that I needed my engine coolant bypass valve replaced. They also said it has been a constant issue with other Rav4 vehicles, but there has not been a recall yet. So I paid \$650 to get the valve replaced and the continuous message taken off.

NHTSA ID Number: 11556307

Incident Date November 1, 2023

Complaint Date November 21, 2023

Vehicle Identification Number 2T3H1RFV1KW****

Summary of Complaint

Coolant bypass valve failure - risk of engine overheating

NHTSA ID Number: 11556456

Incident Date November 21, 2023

Complaint Date November 22, 2023

Vehicle Identification Number 2T3K1RFV3LC****

Summary of Complaint

My coolant bypass valve in the engine malfunctioned and shorted at a mere 27,300 miles on the vehicle and I had to bring it into the dealership to be replaced. A coolant bypass valve failing or malfunctioning can cause the engine to overheat, catch fire, or cause complete seizure. Can also cause the vehicle to stall and possibly cause a crash or wreck. Toyota has acknowledged the problem in the RAV4's but no recalls have been issued. Dealer knew exactly what the problem was when I mentioned that the 'engine maintenance required' light came up on my dashboard BEFORE mechanic diagnosed it and confirmed which tells me they are aware of the issue in these cars.

NHTSA ID Number: 11557699

Incident Date November 30, 2023

Complaint Date November 30, 2023

Vehicle Identification Number 2T3H1RFV7LC****

Summary of Complaint

Coolant bypass valve less than 40k miles and there is hundreds of them going bad this needs to be a recall issue

NHTSA ID Number: 11558972

Incident Date November 29, 2023

Complaint Date December 7, 2023

Vehicle Identification Number 2T3H1RFV0LW****

Summary of Complaint

Coolant bypass valve failed vehicle warning lights came on for this 2020 Toyota Rav4 at 31,641 miles. This is absolutely available for inspection on request. Safety as this can potentially cause overheating, coolant leaking, a cracked cylinder. The manufacturer (Local Toyota dealership - "Ed Morse Delray Toyota" inspected and suggested replacement of the coolant bypass valve for this 2020 toyota rav4 for a price around 800\$. the technician say they see a load of these newer model Rav4's needing new coolant bypass valves. I opted not to immediately replace the valve due to it being a vehicle model-wide issue that should likely be a recall. These appeared the day before I brought it in to the dealer so withing 5-10 miles of the 31,641 miles for this 2020 Toyota Rav4. Warning just says "error please take in to dealership for service".

NHTSA ID Number: 11560982

Incident Date August 14, 2023

Complaint Date December 19, 2023

Vehicle Identification Number 2T3W1RFV4LC****

Summary of Complaint

2020 RAV4 with 47,589 miles. The engine maintenance light came on. It turns off once I shut off the vehicle and start it up again. It only comes back on when I put the air conditioner or heater on. I was told it's the heater control valve/coolant bypass valve and would cost around \$900+ to repair. I did some research and see that this problem is occurring alot.

NHTSA ID Number: 11563563

Incident Date January 4, 2024

Complaint Date January 4, 2024

Vehicle Identification Number 2T3H1RFV1LC****

Summary of Complaint

Vehicle displayed Engine Maintenance Required light at 54,000 miles. As issue was described from dealer, "Engine code was P268115 for an engine coolant bypass valve circuit short to battery or open. Found Coolant valve intermittently sticking." Was told by technician that if the part was not replaced, the issue could lead to engine overheating and that after they made the fix, they were going to check to see if a gasket was possible blown from the issue resulting from overheating that may have gone overlooked.

NHTSA ID Number: 11567111

Incident Date April 17, 2023

Complaint Date January 22, 2024

Vehicle Identification Number 2T3A1RFV0LW****

Summary of Complaint

The engine coolant bypass valve was faulty. The car would not start so I was left stranded 15 miles from home and had to have car towed to Toyota dealer. The problem was confirmed by dealer and they were aware that it was a known issue. The vehicle was inspected by multiple Toyota dealerships. My vehicle displayed an engine maintenance light. The dealerships found the code P268115: Engine Coolant Bypass Valve Circuit short to battery or open

NHTSA ID Number: 11569659

Incident Date February 1, 2024

Complaint Date February 3, 2024

Vehicle Identification Number 2T3P1RFV3LC****

Summary of Complaint

Engine coolant bypass valve failure @40k miles. Could cause engine to overheat possibly be stranded.

NHTSA ID Number: 11570993

Incident Date February 5, 2024

Complaint Date February 9, 2024

Vehicle Identification Number 2T3G1RFVXKW****

Summary of Complaint

Coolant bypass valve is faulty. Everyone is having this issue, please please recall!

NHTSA ID Number: 11571702

Incident Date February 13, 2024

Complaint Date February 13, 2024

Vehicle Identification Number 2T3J1RFV2KC****

Summary of Complaint

Engine cooling issues can cause the engine to overheat and cause a vehicle stall. The vehicle displays "Engine Maintenance Required Visit Your Dealer" when the AC is turned on, and has been confirmed by Arlington Toyota (Jacksonville, FL) dealer as a known issue to the coolant bypass valve with potential safety risks at 2:22pm Eastern on [XXX]. The service department stated that this is common, and the valve is either stuck open or closed, and should be replaced as soon as possible to avoid failure. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11571873

Incident Date February 14, 2024

Complaint Date February 14, 2024

Vehicle Identification Number 2T3N1RFVXKW****

Summary of Complaint

Coolant bypass valve

NHTSA ID Number: 11572428

Incident Date February 15, 2024

Complaint Date February 16, 2024

Vehicle Identification Number 2T3H1RFV1LW****

Summary of Complaint

* Coolant Bypass Valve * This problem costs \$800 to fix at the Toyota Dealership. *My car is a 2020 Rav4 with only 32k miles on it. * After reading thousands of complaints on websites from other 2020 Rav4 owners with the exact same problem, I think there should be a recall as this can be a dangerous issue if the engine overheats. I am shocked that nothing has been done about this yet. *The only warning was a routine maintenance light that comes on every 5,000 miles.

NHTSA ID Number: 11572736

Incident Date February 5, 2024

Complaint Date February 19, 2024

Vehicle Identification Number 2T3W1RFV2LW****

Summary of Complaint

The coolant bypass valve failed on my RAV4 at 67,757 miles. There are multiple similar complaints online and I would like to bring it to the attention to the NHTSA. The engine service light cut on and the dealership replaced the valve to make it go away.

NHTSA ID Number: 11573392

Incident Date February 17, 2024

Complaint Date February 22, 2024

Vehicle Identification Number 2T3K1RFV9LC****

Summary of Complaint

There seems to be a lot of folks online wanting a resolution from Toyota regarding a Coolant Bypass Valve that fails around 30k-60k miles on their 2020 Toyota Rav4's and other models. My Rav 4 just recently had the Engine Maintenance Required pop up on mine & I'm between 30k-40k. Some people had their issue a couple years ago and still nothing has been done about it. Toyota is charging close to \$1000 for total repairs with labor for most of these instances. The community wants & needs a recall.

NHTSA ID Number: 11574112

Incident Date February 26, 2024

Complaint Date February 26, 2024

Vehicle Identification Number 2T3H1RFV6KC****

Summary of Complaint

"ENGINE MAINTENANCE REQUIRED, VISIT YOUR DEALER" Message came up on dash display. Took it to the dealership for diagnostic inspection. They informed me that the coolant bypass valve needed to be replaced. After much research, I found that this is a common occurrence on newer model Rav 4s. If the component is not replaced, I was informed that it could cause overheating and other engine problems. Price to replace plus diagnostic check is around \$650. I have read other complaints about this same issue on the NHTSA website. Will there be a recall issued on this component?

NHTSA ID Number: 11574107

Incident Date February 24, 2024

Complaint Date February 26, 2024

Vehicle Identification Number 2T3Y1RFV8KC****

Summary of Complaint

Engine maintenance light turned on. Found out the engine coolant bypass valve needed to be replaced. Many other reported cases for make and model of this car.

NHTSA ID Number: 11575073

Incident Date February 22, 2024

Complaint Date February 28, 2024

Vehicle Identification Number 2T3W1RFV9LW****

Summary of Complaint

Coolant bypass valve on all newer 2019 and up Rav4 models are known to cause issues or break at early mileage usually before 50k miles. It's a known problem with Rav4 owners and is backed by many claims on social media websites and internet forums. The cost for diagnostic of "engine maintenance required" message on cars dash can range up to \$150 and up for diagnostic fees only at Toyota Dealerships. Other independent mechanics cannot diagnose the problem message. Repair and replacement of \$800 for parts and labor is ridiculous.

NHTSA ID Number: 11575073

Incident Date March 2, 2024

Complaint Date March 2, 2024

Vehicle Identification Number 2T3H1RFV5KW****

Summary of Complaint

"Engine Maintenance Required" message appears on dashboard for this model car is most likely need to replace coolant bypass valve. When researching what could be the problem, people of social media, car forums, etc. were all experiencing the same issue with the car. Coolant leaking in the engine can cause a combustion, overheating or stall in vehicle.

NHTSA ID Number: 11575297

Incident Date February 19, 2024

Complaint Date March 4, 2024

Vehicle Identification Number 2T3W1RFV3KW****

Summary of Complaint

The contact owns a 2019 Toyota Rav4. The contact stated while driving approximately 65 MPH, the "Engine Maintenance Required Please See Dealer" message was displayed. The contact stated that the vehicle was driving normally, however the message was intermittent. The contact had taken the vehicle to a local dealer, where it was diagnosed and determined that the coolant bypass valve needed to be replaced. The dealer advised the contact that the failure was associated to DTC code: P26815; and that coolant was leaking into the engine. The vehicle was repaired. The manufacturer was not informed of the failure. The failure mileage was approximately 47,800.

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NHTSA ID Number: 11575924

Incident Date September 30, 2023

Complaint Date March 7, 2024

Vehicle Identification Number 2T3W1RFV9LW****

Summary of Complaint

p/a engine coolant bypass valve and coolant, and connector with pigtail, pins are full of corrosion inside connector. Items need to be replaced

NHTSA ID Number: 11577063

Incident Date March 12, 2024

Complaint Date March 13, 2024

Vehicle Identification Number 2T3W1RFV5LW****

Summary of Complaint

The engine coolant bypass valve has shorted and needs to be replaced. The dealer has confirmed the issue. First noticed when a message on the dash that said to see the dealer for an engine issue

NHTSA ID Number: 11577294

Incident Date February 4, 2022

Complaint Date March 14, 2024

Vehicle Identification Number 2T3W1RFV5LC****

Summary of Complaint

This is a known issue. Coolant Bypass Valve Issue Error on value says "Engine Maintenance Required, Visit Your Dealer." We have been waiting on the recall at 27,000 miles (brand new purchased). We are at 50,000 miles now and still no resolution and the error stays.

NHTSA ID Number: 11577490

Incident Date March 14, 2024

Complaint Date March 14, 2024

Vehicle Identification Number 2T3J1RFV9KC****

Summary of Complaint

Coolant Bypass Valve went out. Causes the car to overheat if coolant leaks from the valve. HVAC system will not properly work if valve is bad. This is a common problem and should be addressed.

NHTSA ID Number: 11577366

Incident Date February 27, 2024

Complaint Date March 14, 2024

Vehicle Identification Number 2T3W1RFV0LC****

Summary of Complaint

Check engine warning came on, dealer immediately knew it was coolant bypass valve since this is a very common incident with Rav4s recently. My valve was defective and leaking coolant so I had to get it replaced.

NHTSA ID Number: 11578276

Incident Date March 18, 2024

Complaint Date March 18, 2024

Vehicle Identification Number 2T3C1RFV4LW****

Summary of Complaint

I have 48,000 miles on my 2020 Toyota RAV4 XLE Premium, received an Engine warning system light on vehicle, I took the vehicle to my local Toyota dealer in Gastonia, NC, to be told it was a faulty coolant bypass valve. I have noticed online that this has been a reoccurring problem with 2019-2020 RAV4. They quoted me a price of

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\$619.00 to fix. With my car being newer and only having 48,000 miles, I feel this is a fault of Toyota, not mine. Faulty equipment failure on their part.

NHTSA ID Number: 11578276

Incident Date March 16, 2024

Complaint Date March 19, 2024

Vehicle Identification Number 2T3J1RFV3KC****

Summary of Complaint

On [XXX], I brought my car in for its 60,000 mile check up. Everything was marked in the green zone including the “coolant.” On [XXX], car brought back in due to message on the car stating “Engine Service Required.” I went to the dealer and the advisor Daniel already had an idea it was the coolant bypass valve was most likely leaking coolant. Per advisor, he stated he has seen this many times before for these types of car bought within this year always has this problem. Upon inspection, the advisor was correct and it was the coolant bypass valve leaking coolant and needing to be repaired. I had to pay \$1,278.55 just to fix this in a low mileage car. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11578493

Incident Date March 19, 2024

Complaint Date March 20, 2024

Vehicle Identification Number 2T3W1RFVXLW****

Summary of Complaint

I kept getting an engine maintenance message. The coolant bypass assembly failed.

NHTSA ID Number: 11579370

Incident Date March 25, 2024

Complaint Date March 25, 2024

Vehicle Identification Number 2T3K1RFV9LW****

Summary of Complaint

Engine maintenance required, visit your dealer. There are a lot of Toyota owners with this issue and they said it is the coolant bypass valve. Toyota needs to fix/recall this issue. They want to charge us 700 dlls but it should be free.

NHTSA ID Number: 11579598

Incident Date March 26, 2024

Complaint Date March 26, 2024

Vehicle Identification Number 2T3F1RFV0KC****

Summary of Complaint

Engine Maintenance Required Alert popped up on my vehicle. It’s a 2019 RAV4 with barely 60k mileage on it that I bought new off the dealership back in 2019. They are charging me \$800 to get the coolant bypass valve repaired, but this is a known issue that all RAV4’s are experiencing (regardless if it’s at 20k or 100k miles)

NHTSA ID Number: 11579922

Incident Date October 18, 2023

Complaint Date March 28, 2024

Vehicle Identification Number JTMH1RFV6KD****

Summary of Complaint

The engine maintenance required turned on at 55k miles for the coolant bypass. After trying to get it repaired they had 500 on back order. Thousands of Rav 4’s are experiencing this with over \$800 quote to repair , this cannot just be a basic issue this is bigger.

NHTSA ID Number: 11580299
Incident Date March 23, 2024
Complaint Date March 31, 2024
Vehicle Identification Number 2T3W1RFV6MC****
Summary of Complaint
 Coolant Bypass Valve failed.

NHTSA ID Number: 11580710
Incident Date April 2, 2024
Complaint Date April 2, 2024
Vehicle Identification Number 2T3C1RFV8LC****
Summary of Complaint

“Engine maintenance required visit your dealer” appeared on screen. After searching for similar issues. The coolant bypass valve has malfunctioned or failed. The fact that hundreds if not thousands of others have had this issue and it has not yet been recalled coupled with the fact that this isn’t covered under powertrain warranty is just crazy. Considering when reporting this issue I had to select powertrain that showed coolant / hoses under the menu baffles me even more that it wouldn’t even be considered covered under warranty. There needs to be a recall. \$700+ to replace a sub \$100 hose and sensor that has nothing to do with normal wear and tear.

NHTSA ID Number: 11581168
Incident Date March 11, 2024
Complaint Date April 4, 2024
Vehicle Identification Number 2T3W1RFV0KW****
Summary of Complaint

Coolant Bypass Valve leaking onto electrical systems. If not fixed, electrical system will fail. Toyota is aware that it's a common problem.

NHTSA ID Number: 11581625
Incident Date April 7, 2024
Complaint Date April 7, 2024
Vehicle Identification Number 2T3P1RFV7KC****
Summary of Complaint

Engine maintenance required message. The issue is the coolant bypass valve. I’ve seen hundreds of others complain about the same issue.

NHTSA ID Number: 11581581
Incident Date July 14, 2023
Complaint Date April 7, 2024
Vehicle Identification Number 2T3Y1RFV0KC****
Summary of Complaint

2019 RAV4 with persistent check engine light. Dealership states it is a faulty coolant bypass valve. Valve is not leaking, it appears to be an issue with the part.

NHTSA ID Number: 11582691
Incident Date April 1, 2024
Complaint Date April 12, 2024
Vehicle Identification Number 2T3G1RFV0KC****
Summary of Complaint

Faulty Coolant Bypass Valve. Toyota dealership told me it is the 20th one this week.

NHTSA ID Number: 11582858
Incident Date January 1, 2024
Complaint Date April 14, 2024

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Vehicle Identification Number 2T3W1RFV8KW****

Summary of Complaint

The coolant bypass valve is going bad and needs to be replaced. If it goes bad then it could cause significant damage to my engine. The car Toyota car dealership stated that it is an a common issue with this year, make, and model.

NHTSA ID Number: 11583103

Incident Date March 1, 2024

Complaint Date April 15, 2024

Vehicle Identification Number 2T3H1RFV1KW****

Summary of Complaint

-Engine maintenance required light is in and will not clear when the AC unit is running.
-The engine coolant bypass valve is the problem. -Not sure if it affects safety if it were to fail. -This has been confirmed with independent service center.

NHTSA ID Number: 11583530

Incident Date April 15, 2024

Complaint Date April 17, 2024

Vehicle Identification Number 2T3J1RFV2KC****

Summary of Complaint

"maintenance required visit your dealer" message came on at ~84k miles, continued to come on intermittently thereafter despite resetting maintenance reminder. Checked error codes and discovered issue was a faulty coolant bypass valve. Upon researching this issue, learned that numerous Toyota owners have experienced the same issue on various years/models and that dealership service centers are well aware of the problem. Despite this, Toyota has not issued any TSBs, or offered to compensate customers for replacement of this obviously defective part.

NHTSA ID Number: 11583719

Incident Date April 15, 2024

Complaint Date April 17, 2024

Vehicle Identification Number 2T3P1RFV6LC****

Summary of Complaint

Coolant bypass sensor is faulty.

NHTSA ID Number: 11583579

Incident Date March 3, 2024

Complaint Date April 17, 2024

Vehicle Identification Number 2T3F1RFV9LC****

Summary of Complaint

1. The coolant bypass valve failed. I had to pay about \$950 to get it fixed because it is a safety issue and was not covered under any warranties. 2. Yes they were. The coolant bypass valve is responsible for maintaining optimal engine temperature. With this part broken it, the engine can overheat as the coolant will not circulate through the radiator. 3. Yes. The toyota dealership informed us they see an unreal amount of people with faulty coolant bypass valves. It is an issue with the part. 4. It was inspected by the Toyota dealership in Round Rock. 5. No there was nothing to indicate an issue. I only discovered the problem because I got a "engine maintenance required" warning on my dash.

NHTSA ID Number: 11583838

Incident Date April 18, 2024

Complaint Date April 18, 2024

Vehicle Identification Number 2T3C1RFVXKW****

Summary of Complaint

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Received the message on my 2019 Toyota Rav 4: ENGINE MAINTENANCE REQUIRED. VISIT YOUR DEALER. Diagnostic: Coolant Bypass Valve REPLACEMENT needed. Factory warranty does not cover. After researching this issue I am shocked that there has not been a recall placed for this, there are hundreds of threads with people experiencing this same issue with their Toyota RAV4. This is over a \$800 repair that should be covered by the manufacturer as it is an obvious equipment malfunction due to the manufacture with the overwhelming number of others having this same issue.

NHTSA ID Number: 11583800
Incident Date April 18, 2024
Complaint Date April 18, 2024
Vehicle Identification Number 2T3F1RFV5LW****
Summary of Complaint
Coolant bypass valve.

NHTSA ID Number: 11584419
Incident Date April 1, 2024
Complaint Date April 22, 2024
Vehicle Identification Number 2T3W1RFV7LC****
Summary of Complaint
Coolant bypass valve error.

NHTSA ID Number: 11584647
Incident Date April 23, 2024
Complaint Date April 23, 2024
Vehicle Identification Number 2T3P1RFV8KC****
Summary of Complaint

I have a message saying "Engine maintenance required" that will not clear off of my car. People at my local dealership acted like it was just the normal maintenance message, but it's not. After doing some research looks like other Toyotas the same year as mine are having the same issue and it's a coolant bypass valve leak, I don't see where this is a recall yet but I'm seeing millions of other people having the same issue. I see where there is an engine recall on 2019 but when I put my Vin number in it said mine wasn't one of those. , I don't see where this is a recall yet but I'm seeing millions of other people having the same issue. I see where there is an engine recall on 2019 but when I put my Vin number in it said mine wasn't one of those but I'm having that issue.

NHTSA ID Number: 11584806
Incident Date April 23, 2024
Complaint Date April 23, 2024
Vehicle Identification Number 2T3W1RFV3LC****
Summary of Complaint
Coolant bypass valve.

NHTSA ID Number: 11584960
Incident Date April 1, 2024
Complaint Date April 24, 2024
Vehicle Identification Number 2T3W1RFV8LW****
Summary of Complaint

My name is [XXX] and I would like to file a complaint against Toyota. I purchased my RAV4 XLE in 2020 after returning home from military training. This was my dream car and I was filled with joy to be able to purchase it. In the four years I have had it, I have had minimal issues, nothing to note other than normal wear and tear, until recently. The "Engine Maintenance Required" light came on roughly 3 weeks ago. I deemed it

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to be my oil change notification and reset it knowing when my next oil change was due. The notification came back on to which I started investigating further. I typed in "2020 RAV4 Engine Maintenance Required" into Google and was surprised at how many car forums and complaints popped up for this exact problem. It was an astronomical number of complaints made by loyal Toyota owners. I scrolled for an hour reading everyone's story, which was almost identical to mine. I made an appointment at my nearest Toyota in Bountiful, UT to get a diagnostic test done. Not to my surprise, the code that was tripping the system was for the 'coolant bypass valve.' I was quoted \$660 for the parts and labor. After getting a price breakdown and verbally stating how frustrated I was with this issue due to how many others online had the same issue and there not being a recall, I felt like my only option was to pay it and suppress my anger. I am not upset with the Toyota dealership I went to. I am upset that this is a very known issue that even the mechanic verbally stated knowing about, and that Toyota as a large corporation is not doing right by the people who swear by owning Toyota's and their reputable reputation. I called two private mechanics about the issue and they both stated that they have worked on several RAV4's with this issue. It is not cosmetic, it is a critical issue that needs to be fixed. I hope this complaint makes it to the right hands and a solution is implemented so people can enjoy their car without these worries. Thank you.

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NHTSA ID Number: 11584942
Incident Date April 23, 2024
Complaint Date April 24, 2024
Vehicle Identification Number 2T3P1RFV4KC****
Summary of Complaint
Coolant bypass valve code P268115.

NHTSA ID Number: 11585965
Incident Date April 25, 2024
Complaint Date April 29, 2024
Vehicle Identification Number 2T3D6RFV8MW****
Summary of Complaint

Engine maintenance light came on saying to go to dealer at 35,000 miles. The coolant bypass valve needs to be replaced in order to prevent the engine from overheating. Our repair shop coordinated with the dealership who admitted that they commonly see this issue on RAV4 and Corolla models, though there is no recall currently in place.

NHTSA ID Number: 11585966
Incident Date April 29, 2024
Complaint Date April 29, 2024
Vehicle Identification Number 2T3C1RFV7LW****
Summary of Complaint

Coolant bypass valve failure 1000\$ to replace on a vehicle that's only a few years old Toyota refuses to fix it.

NHTSA ID Number: 11586081
Incident Date April 1, 2024
Complaint Date April 30, 2024
Vehicle Identification Number 2T3W1RFV8LC****
Summary of Complaint

Engine maintenance required. Found that coolant bypass valve has malfunctioned. Warranty will not cover due to being over 30k miles.

NHTSA ID Number: 11586169

Incident Date April 24, 2024

Complaint Date April 30, 2024

Vehicle Identification Number 2T3P1RFVXLW****

Summary of Complaint

Coolant bypass valve is faulty, coolant leaks into sensor. Coolant regulation is important for maintaining proper engine temperature and failure with this system can lead to larger engine issues, possibly leading to catastrophic engine failure. Problem verified by independent mechanic and dealer. Issue was inspected by dealer. The message "Engine Maintenance Required // Visit Your Dealer" displays on dash.

NHTSA ID Number: 11586570

Incident Date May 1, 2024

Complaint Date May 2, 2024

Vehicle Identification Number 2T3P1RFV5LC****

Summary of Complaint

My 2020 Toyota Rav4 was just diagnosed with an engine coolant bypass valve failure. The leak from this valve could cause engine overheating. This seems to be a well known defective engine component that Toyota appears unwilling to address.

NHTSA ID Number: 11586618

Incident Date April 22, 2024

Complaint Date May 2, 2024

Vehicle Identification Number 2T3W1RFV9KW****

Summary of Complaint

The engine maintenance light came on at 82,300 miles. After running diagnostics, I was told at the Toyota dealership that it was the coolant bypass valve assembly. Toyota stated that this was a very common problem in this year model RAV4. The fix was almost \$1000.

NHTSA ID Number: 11586887

Incident Date May 2, 2024

Complaint Date May 3, 2024

Vehicle Identification Number 2T3A1RFV1LC****

Summary of Complaint

Coolant bypass valve

NHTSA ID Number: 11587072

Incident Date April 24, 2024

Complaint Date May 5, 2024

Vehicle Identification Number 2T3C1RFV9LC****

Summary of Complaint

I just bought my 2020 RAV4 in November with the lifetime powertrain warranty. By April, I had a "Engine Maintenance Required" light that would not go away. I took it to the dealership and it was my coolant bypass valve. \$800 later, it's fixed. Not covered under any warranty. Very common issue that Toyota charges a lot to fix.

NHTSA ID Number: 11587337

Incident Date March 1, 2024

Complaint Date May 6, 2024

Vehicle Identification Number 2T3G1RFV0KC****

Summary of Complaint

#16260-F0010 B/O PART COOLANT BY-PASS LOST Vehicle is a 2019 RAV4, odometer reads 37849. I've had a persistent "Engine Maintenance Required" notification on the MID screen for the last 1500 miles or so, literally the day after

getting a scheduled service at the dealer. I initially thought it was just the service reminder, so I didn't think much of it, and just ignored it. But eventually it became so annoying that I tried to clear the notification, and couldn't-- and upon further research, it turns out the notification is probably the result of a leaking coolant bypass valve. I haven't noticed any loss in coolant, haven't experienced any abnormal engine temps, and haven't had any CELs. I've also noticed that the notification only comes on now when I have the A/C turned on.

NHTSA ID Number: 11587135

Incident Date May 6, 2024

Complaint Date May 6, 2024

Vehicle Identification Number 2T3H1RFV9KC****

Summary of Complaint

Engine coolant bypass valve failure when the vehicle was very new. Message "engine maintenance required" showing on screen, unable to bypass message. Nearly \$1000 to fix, which is not something I am capable of doing.

NHTSA ID Number: 11587226

Incident Date May 6, 2024

Complaint Date May 6, 2024

Vehicle Identification Number 2T3C1RFV2KC****

Summary of Complaint

The vehicles "Engine Maintenance Required. Visit your Dealer" notice appeared on the dashboard screen. Changed the oil, reset the scheduled maintenance button, ran diagnostics from The Auto Store, and it still appeared. The Toyota Dealership ran their own diagnostic and said it was due to P268115 set for failed coolant bypass valve.

NHTSA ID Number: 11587424

Incident Date May 1, 2024

Complaint Date May 7, 2024

Vehicle Identification Number 2T3H1RFV8LC****

Summary of Complaint

2020 rav4 coolant bypass valve problem. This is an issue that is been happening in the 2019 and 2020 models even with less than 55,000 miles on it. My vehicle milage is 52,000 and now I'm having this problem and the dealer is charging \$700.00 to fix the issue. I thought that Toyota vehicles were reliable but this is ridiculous.

NHTSA ID Number: 11587648

Incident Date May 8, 2024

Complaint Date May 8, 2024

Vehicle Identification Number 2T3J1RFV5LC****

Summary of Complaint

"Engine Maintenance Required" appeared on the screen and immediately took the vehicle to my local dealership. Dealer claims "Engine coolant bypass valve" Has malfunctioned and needs to be replaced. They are charging \$697.54 for the repair. After a little research online including nhtsa.gov this seems to be an extremely common issue and needs to be recalled.

NHTSA ID Number: 11587884

Incident Date April 25, 2024

Complaint Date May 9, 2024

Vehicle Identification Number 2T3F1RFV8KW****

Summary of Complaint

ENGINE COOLANT BYPASS VALVE CIRCUIT

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NHTSA ID Number: 11588156

Incident Date May 9, 2024

Complaint Date May 10, 2024

Vehicle Identification Number 2T3A1RFV7LW****

Summary of Complaint

The contact owns a 2020 Toyota Rav4. The contact stated that the "Engine Maintenance Required Visit Your Dealer" message was displayed. The vehicle was taken to a dealer where a diagnostic was performed. The contact was informed that coolant bypass valve was defective and needed to be replaced. The manufacturer was notified of the failure; the contact was informed that there were no recalls on the vehicle. The vehicle was repaired. The failure mileage was 26,643.

NHTSA ID Number: 11588353

Incident Date November 6, 2023

Complaint Date May 12, 2024

Vehicle Identification Number JTMA1RFV7KD****

Summary of Complaint

I bought this car last year on October 4th from carmax (mileage was 62k at the time of purchase). I started to have problems the next month on November 6th with the brakes which was rusted and had to replace the pads. That was very dangerous and could have hurt myself driving around the heavy rain at the time. I was scared for my safety and others wellbeing so I took the car to the dealership. Their mechanic checked the car and told me that this wasn't fixed or checked since April 2023 before I bought the car in october 2023. I had problems with the infotainment system. the map navigation for my android and iPhone doesnt work anymore. the mechanic at the dealership fixed the rear break pads and discs but couldnt fix the infotainment system even after updating the system. He issued me a 250 dollar refund and was charged 680 dollars for the rest of the job. Another issue happened on March 2024 for the front barring needed to be replaced from a carmax mechanic shop. Paid 380 to fix. This month I got a message saying " engine maintenance required, go to dealership". I took the car to the mechanic and explained that the computer code error message means the coolant valve is defective. I'm thinking of going to the dealer tomorrow up until I found out the car never got the recall repaired from this website. Could this be the reason why I'm having this may problems? The car hasn't been inspected by police or insurance, only the toyota manufacturer on November 6th who told me about the car not getting fixed since April 2023. I have the invoice of all these repairs done. The latest mechanic that told me about the coolant valve being defective thought I needed to change my oil. He did change the oil and charged me 189 dollars. I'm planning on taking the mechanic to fix that problem since the toyota dealership was gonna charge me to fix the transmission fluid which isn't the problem. I will upload the receipt for the oil change job.

NHTSA ID Number: 11588644

Incident Date May 13, 2024

Complaint Date May 14, 2024

Vehicle Identification Number 2T3A1RFV5KC****

Summary of Complaint

"Engine Maintenance Required" appeared on the screen. After an internet search I took the vehicle to Passport Toyota in Marlow Heights, MD. Dealer claims "Engine coolant bypass valve" needs to be replaced. They charged me \$681.72 for the repair. After a little research online including nhtsa.gov this seems to be an extremely common issue and needs to be recalled.

NHTSA ID Number: 11588638

Incident Date May 10, 2024

Complaint Date May 14, 2024

Vehicle Identification Number 2T3C1RFV4KW****

Summary of Complaint

my 2019 Rav4 has a message "to visit the dealer" vehicle needs maintenance. i believe code #P2681. The coolant bypass valve. the dealer told me that the coolant bypass valve needs to be replaced. Also through my research this is a known issue with certain Toyota vehicles including the Rav 4. Deal needs approx \$1,000 to replace the coolant bypass valve. My personal mechanic researched the known issue and wants me to purchase the parts from Toyota #16260-f0010. \$119.68 from toyota online parts. I am not sure what to do. No recall "YET" and vehicle not in warranty.

NHTSA ID Number: 11588981

Incident Date May 12, 2024

Complaint Date May 15, 2024

Vehicle Identification Number 2T3W1RFV7LW****

Summary of Complaint

engine maintenance required light, after much research it shows it is a common defect in 2019-2022 models. Coolant Bypass Valve malfunction or failure. This can lead to overheating/fire. Appeared at 70k, all maintenance done by certified toyota dealership

NHTSA ID Number: 11588958

Incident Date May 10, 2024

Complaint Date May 15, 2024

Consumer Location SOMERSET, MA

Vehicle Identification Number 2T3F1RFV7LC****

Summary of Complaint

Engine maintenance light comes on this is not the maintenance light this morning light is not in the owner's manual I had to Google the problem to find out the answer it is a faulty coolant bypass valve my car has 47,000 miles other people have reported the same issue Toyota won't acknowledge and won't fix the problem there are complaints from many other people about this

NHTSA ID Number: 11589151

Incident Date May 16, 2024

Complaint Date May 16, 2024

Vehicle Identification Number 2T3A1RFV0KW****

Summary of Complaint

At 73,000 miles the "engine maintenance required" warning light came on indicating the coolant bypass valve is damaged or has failed. A quick google search will show this is an extremely common issue and a result of using inferior quality parts in manufacturing. Toyota should recall this issue asap as many people have had the same problem.

NHTSA ID Number: 11589007

Incident Date May 15, 2024

Complaint Date May 16, 2024

Vehicle Identification Number 2T3C1RFV2KC****

Summary of Complaint

Coolant Bypass Valve failure with only 27000 miles

NHTSA ID Number: 11589749

Incident Date May 18, 2024

Complaint Date May 20, 2024

Vehicle Identification Number JTMN1RFV9KD****

Summary of Complaint

A warning notice displayed on my vehicle indicating that "engine maintenance required" "visit your dealer". The warning message will not clear from the display. A certified auto mechanic downloaded the code which indicated that the issue was a failed Coolant Bypass Valve. This part is a known and frequent issue with Toyota's and there is such a high demand for this part that it is on backorder nationwide. The earliest that this part is available may be July or later. TSB #TTT069922 has been issued regarding this prevalent issue. This problem directly impacts air conditioning performance. Due to the long wait for the part, air conditioning will not cool to the level needed for the long hot summer ahead. Toyota should consider issuing a recall for this problem.

NHTSA ID Number: 11590076
Incident Date May 21, 2024
Complaint Date May 22, 2024
Vehicle Identification Number 2T3H1RFV0KW****
Summary of Complaint

Engine maintenance required warning notice came on. Researched showed this to be a failure of the coolant bypass valve. It is a well known and documented problem with can lead to the engine overheating and seizing. Called dealership and they were well aware of issue and wanted \$1,100. to repair. My car only has 46K miles on it. Toyota should issue a recall.

NHTSA ID Number: 11590051
Incident Date December 6, 2023
Complaint Date May 22, 2024
Vehicle Identification Number 2T3H1RFV2LW****
Summary of Complaint

The vehicle start showing the (Engine maintenance required) message around 40k miles. The bypass coolant valve needs to be replaced. The dealership did confirm the issue. The issue will result in the engine overheating or seizure. A lot of people who own RAV4 2019-2024 had the same issue.

NHTSA ID Number: 11590086
Incident Date May 22, 2024
Complaint Date May 22, 2024
Vehicle Identification Number 2T3A1RFV4LW****
Summary of Complaint

Engine maintenance required, contact dealer Alert displaying to replace coolant bypass valve. Vehicle has 38,144 miles. Internet search of this issue has been reported by several consumers with vehicles less then 4 years old. Not covered under warranty and quoted at \$700- ridiculous!

NHTSA ID Number: 11590460
Incident Date May 17, 2024
Complaint Date May 23, 2024
Vehicle Identification Number 2T3W1RFV1KW****
Summary of Complaint

"Engine maintenance required" maintenance light on dashboard. Very common issue within RAV4s. This message blocks the odometer on the dashboard when visible. It shows warning lights on the display as well. The part that needs replacing is a "coolant bypass valve". My dealer wanted nearly \$1000 to replace this part, and told me this part was on back order nationwide. My car begins to overheat after 1.5 hours of driving. The dealer said to pull over when operating my vehicle and it begins to overheat. This problem is an inconvenience as I commute to work in a busy city. This problem was first presented last week after my scheduled oil change with my local

dealer. The next day (5/17/2024) the light came on my dashboard—unable to be removed. I first brought it into the dealer for a diagnostic on 5/20/2024, this is when they diagnosed a coolant bypass valve. I brought it back to the dealer today (5/23/2024) to have the part replaced, and was told it was on back order. I am afraid to operate my vehicle for long periods of time due to this issue. It has become a major inconvenience in my personal life this week, causing me to call out of work twice. This needs to be addressed by Toyota immediately.

NHTSA ID Number: 11590357

Incident Date May 16, 2024

Complaint Date May 23, 2024

Vehicle Identification Number 2T3C1RFVXLW****

Summary of Complaint

Coolant bypass valve failure. 2020 model year Vehicle has 38,000 miles with a failed coolant bypass valve.

NHTSA ID Number: 11590350

Incident Date May 22, 2024

Complaint Date May 23, 2024

Vehicle Identification Number 2T3F1RFV6LC****

Summary of Complaint

Engine Maintenance Required, Visit Dealer message came on, googled problem and Coolant Bypass Valve keeps popping up.

NHTSA ID Number: 11590670

Incident Date May 23, 2024

Complaint Date May 24, 2024

Vehicle Identification Number 2T3H1RFV1KW****

Summary of Complaint

"Engine Maintenance Required See Dealer" message keeps appearing on my dashboard took it to my local Toyota dealer and they confirmed the problem is the coolant bypass valve/hose \$150 to find the problem and \$700 to fix apparently this is common in 2019-2022 RAV4s. Now my car won't drive for long without over heating I have only had my car for a year and a half and drive less than 5,000 a year.

NHTSA ID Number: 11590766

Incident Date May 24, 2024

Complaint Date May 25, 2024

Vehicle Identification Number 2T3F1RFV7LC****

Summary of Complaint

1. I had to have Injector Fuel Service due to my vehicle having a sluggish feeling while driving from Stop to Start. The vehicle also had a throttling motion while driving. 2. A message appeared on dashboard after a recent visit to the dealership after normal maintenance service, "Engine Maintenance Required" "Reach out to Dealer." This message specifically shows while I start up my vehicle and will not disappear if cancelled. "This is a warning for a coolant bypass valve failure"

NHTSA ID Number: 11590894

Incident Date May 27, 2024

Complaint Date May 27, 2024

Vehicle Identification Number JTMH1RFV4KD****

Summary of Complaint

Engine coolant valve by-pass issues. Engine coolant bypass hose fails.

NHTSA ID Number: 11591345

Incident Date April 8, 2024

Complaint Date May 29, 2024

Vehicle Identification Number 2T3K1RFV3KW****

Summary of Complaint

"Engine maintenance required" warning light came on and unable to bypass at all, leaving driver unable to read odometer or speedometer while driving. Had to go to the dealership 2 days in a row before they finally addressed the warning. Service staff informed this is indicating the coolant bypass valve is damaged or has failed. Also informed that this is a very common issue regardless of location, mileage, or usage of vehicle and will happen to all RAV4 owners of certain years eventually. A quick google search will show this is an extremely common issue and a result of using inferior quality parts in manufacturing. Toyota should recall this issue asap and reimburse drivers as many people have had the same problem. Had to pay over \$600 at dealership to address issue that Toyota's manufacturing caused and to be able to have full usage of vehicle again. This is a dangerous issue if drivers without financial means to address this problem are driving without being able to use their vehicle display tools among other issues regarding the engine.

NHTSA ID Number: 11591322

Incident Date May 25, 2024

Complaint Date May 29, 2024

Vehicle Identification Number 2T3N1RFV4LW****

Summary of Complaint

My 2020 Rav4 Limited AWD alerted me that the engine needed maintenance, and, so I parted it until Tuesday, After talking to the service professional at Passport Toyota, they told me about everything else but did not see that the light was on. They did my regular 55,000 miles maintenance on my car. So before driving away, I noticed that the alert was still blinking on my car. Their findings is that the coolant bypass valve/hose etc., has gone bad and is remaining in the open position. Apparently, this part isn't covered by warranty. After reading, there are a lot of years such as 2019, 2018 to name a few having had the same problem. And to fix the problem it is \$857.22. Since this problem is occurring in a lot of Rav4's, and I noticed Camry's as well, should they look into why this is happening in a lot of models of their cars, SUV's etc.

Corolla Complaints

NHTSA ID Number: 11471443

Incident Date June 24, 2022

Complaint Date June 28, 2022

Vehicle Identification Number JTDS4RCE3LJ****

Summary of Complaint

Code P2688115 engine maintenance required sign turned on at around 41000 miles. Other people having similar problems with coolant bypass valve. Suspect that coolant bypass valve safety standards might be at fault.

NHTSA ID Number: 11527522

Incident Date June 2, 2023

Complaint Date June 17, 2023

Vehicle Identification Number JTDP4RCE3LJ****

Summary of Complaint

Coolant bypass valve problem. Engine maintenance required light has come on. This part affects several other components of the vehicle. Toyota dealership wants to charge \$800 to fix it. It is a very common issue faced by many customers of 2020+ Corollas and 2019+ Rav4s. All dealerships with service departments are aware of this issue.

NHTSA ID Number: 11528747

Incident Date June 24, 2023

Complaint Date June 25, 2023

Vehicle Identification Number 5YFS4RCE8LP****

Summary of Complaint

Just bought a used 20 Corolla SE and put less then 500 miles on it and got a "maintenance required return to dealer" notification on the dash and a warning message in my information screen via infotainment system. Dealer said they got nothing via a scan. The issue is the Coolant Bypass Valve. I reset the light on the dash and restarted my car with air off and it did not come back on. The second you turn on the air (the A/C in particular) the light immediately popped back on along with a new warning message. I've looked around and there's literally THOUSANDS of people reporting the same issue all on vehicles between 15k and 100k miles. The dealers also charge at least \$600-\$1100 to remedy this all too common issue as they will tell you it is not covered under warranty. I'm unsure of what promised damage to the vehicle could be but I know for a fact it's not nothing. Everyone is dumbstruck with how many people have this issue and there is still no Recall on this clearly terribly made Coolant Bypass Valve. It seems to apply of us that this is just a cash grab for Toyota

NHTSA ID Number: 11537654

Incident Date August 9, 2023

Complaint Date August 10, 2023

Vehicle Identification Number 5YFS4RCE8LP****

Summary of Complaint

Engine maintenance light came on and found out I had replace coolant bypass valve. Apparently this is an issue many 2020 corollas and RAV4 have issues with and need replacement. There's no reason or rhyme as to why it becomes faulty but should be recalled as many people have the same issue and dealership are aware of this issue.

NHTSA ID Number: 11540850

Incident Date August 25, 2023

Complaint Date August 25, 2023

Vehicle Identification Number 5YFS4MCE5MP****

Summary of Complaint

I went in after my vehicle displayed a check engine code after my recent visit to the dealer which included a regular oil change plus multi point inspection. At 51k miles the check engine went on and said immediately to go to the dealer. After paying for the dealer inspection, which was extra money, the issue was the engine coolant bypass valve for my vehicle that failed and leaked. I asked if this was common and the dealer said yes since they've been replacing them. I checked online forums and hundreds of people have had this issue at random miles. This costed me over \$900 dollars to repair and could of damaged my cars engine leaving me without a vehicle or cause a safety accident. I paid a hefty bill for a faulty item that should have been recalled since it's quite "common" according to the toyota dealership. I regularly maintain my vehicle with the recommended maintenance and this should have not occurred.

NHTSA ID Number: 11546144

Incident Date August 1, 2023

Complaint Date September 23, 2023

NYE, STIRLING, HALE, MILLER & SWEET
33 WEST MISSION STREET, SUITE 201
SANTA BARBARA, CALIFORNIA 93101

Vehicle Identification Number 5YFS4RCE0LP****

Summary of Complaint

I had to replace all four tires before reaching 40k miles. Brakes needed to be fully replaced with only two years of driving it. AND Engine Maintenance Light on for an issue with the coolant bypass valve, not covered under warranty. This is causing issues with the engine, when driving even at 25 miles per hour or at 65 the car sounds like its dragging or forcing itself, the wheel shake & car feels unbalanced even with a tire alignment. Overall i give the car a 2.5 out 5 star in performance. The body of the car is so fragile and made by very cheap materials. Spending a fortune on this vehicle and it hasnt even reached 60k miles yet.

NHTSA ID Number: 11552606

Incident Date October 23, 2023

Complaint Date October 30, 2023

Vehicle Identification Number 5YFM4RCEXLP****

Summary of Complaint

In the past week at 30,700 miles, my 2020 Toyota Corolla "Engine Maintenance light; see dealer" service light appeared on the dash. Through talking with a Toyota dealer, they are aware of this issue with Corollas, Camrys, and Rav4's. It is an engine coolant bypass valve, and appears to be faulty in many vehicles according to youtube videos, google, and Toyota service. Perhaps this needs to be a recall? Also, the dealer wants almost \$800 to repair even though many people do it on youtube in under an hour. Parts are less than \$200, and 1.5 hours of labor do not add up to \$800.

NHTSA ID Number: 11557060

Incident Date November 27, 2023

Complaint Date November 27, 2023

Vehicle Identification Number JTDS4RCE7LJ****

Summary of Complaint

Coolant bypass valve failure. Replacement part carried the same defect.

NHTSA ID Number: 11565585

Incident Date October 9, 2023

Complaint Date January 15, 2024

Vehicle Identification Number JTNK4RBE5K3****

Summary of Complaint

Coolant bypass valve failed prior to car driving 50,000, confirmed by dealership. Failure can cause electrical issues. Car indicated engine maintenance required

NHTSA ID Number: 11566170

Incident Date September 6, 2023

Complaint Date January 17, 2024

Vehicle Identification Number JTDS4RCE0LJ****

Summary of Complaint

Around 40k miles I received an Engine Maintenance Required warning. After some research Engine Maintenance and Engine Service Required are two very different indicators. I received and P2681 code meaning the electrical coolant bypass valve had failed unfortunately one can't tell if it's stuck shut or open this could lead to one's care over heating and or damaging one's engine. After some research I've come to find out most 2020-2024 corollas have been having this issue tends to happen about 30-50k miles

NHTSA ID Number: 11568354

Incident Date January 27, 2024

Complaint Date January 28, 2024

Vehicle Identification Number JTNA4RBE2L3****

Summary of Complaint

The coolant bypass valve in some Toyota models has been malfunctioning recently and has become a common issue. Dealer confirmed that this was the issue per attached diagnostic report/invoice copy. Costs were >\$800 to repair the issue for a <\$100 part and 30 minutes of labor. The "Engine Maintenance Required" warning was visible in the display. Unsure as to the short or long-term effects of this malfunctioning part, but as it's related to the cooling system of the vehicle, it may trigger other more serious issues

NHTSA ID Number: 11568593

Incident Date January 7, 2024

Complaint Date January 29, 2024

Vehicle Identification Number JTDS4RCE3LJ****

Summary of Complaint

There is a thing that's happening to a lot of Corollas and I think RAV4 and some cram it's called engine maintenance required and a lot of mechanics don't know what that means so you have to take it to the dealership to get it fixed and it's like a \$900 fix and it's been happening to a lot of vehicles around 35,000 miles. It's called the coolant bypass valve. There is hundreds of YouTube videos about it and people complaining about it on forums.

NHTSA ID Number: 11569018

Incident Date January 31, 2024

Complaint Date January 31, 2024

Vehicle Identification Number JTDT4RCE8LJ****

Summary of Complaint

Coolant bypass valve bad cost \$550+ to fix car is 4 years old

NHTSA ID Number: 11574504

Incident Date February 28, 2024

Complaint Date February 28, 2024

Vehicle Identification Number 5YFS4RCE8LP****

Summary of Complaint

Coolant bypass valve

NHTSA ID Number: 11575517

Incident Date February 29, 2024

Complaint Date March 5, 2024

Vehicle Identification Number JTND4RBEXL3****

Summary of Complaint

Coolant bypass valve leaks through wiring and damages itself.

NHTSA ID Number: 11575629

Incident Date March 5, 2024

Complaint Date March 5, 2024

Vehicle Identification Number 5YFS4RCE1LP****

Summary of Complaint

toyota 2020 COOLANT BYPASS VALVE Circuit Short.

NHTSA ID Number: 11575546

Incident Date March 1, 2024

Complaint Date March 5, 2024

Vehicle Identification Number JTND4RBE8L3****

Summary of Complaint

After I had brought a my car to the dealer for its oil change and tire rotation, a warning message came from my car saying "Engine Maintenance Required". After checking with my dealer, they said that the coolant bypass valve needed to be replaced. After checking online, it seems that this is a common problem for recent Toyota vehicles.

NHTSA ID Number: 11575551

Incident Date March 1, 2024

Complaint Date March 5, 2024

Vehicle Identification Number JTND4RBE8L3****

Summary of Complaint

After bringing my vehicle in for its oil change and tire rotation, a warning message showed up from my car saying "Engine Maintenance Required". After checking with my dealer, they said that the coolant bypass valve needed to be replaced. My car only has 33,000 miles and has had no issues whatsoever.

NHTSA ID Number: 11576109

Incident Date February 1, 2024

Complaint Date March 7, 2024

Vehicle Identification Number 5YFS4RCE9LP****

Summary of Complaint

I discovered that my 2020 Toyota Corolla SE has a Coolant Valve Bypass malfunction coded "p2688115". I have also discovered this a prevalent issue after you hit 70,000 miles. There are forums all over the internet with complaints about the same issue as mine. I did some research and found no recalls. With this being such a common issue for no reason, faulty equipment. The car has been inspected by a Toyota dealer in Bradenton, FL because we had thought the service vehicle message was for a tire rotation. They scanned the vehicle and discovered the fault code "p2688115" after trying to reset it numerous times. The senior tech was the one who scanned it. He knew the exact reason why it was not clearing before scanning the vehicle. He only scanned it to solidify his hypothesis. I then spoke to the service team, they wanted me to bring it in for a diagnosis that would cost \$85.00 if my warranty did not cover it. The cost of the part was estimated at around \$150.00 plus labor and taxes. It was over a \$400.00 repair. For a repair as such, this needs to be recalled. The warning message never went away, if you tried to clear it to view the screen you had about three seconds before it came back on. It is a major safety risk for those who wear glasses and drive at night. I use the screen to keep myself safe and maintain my driving speed. This warning message came on around 70,000. Some so many other individuals have experienced and complained about the same problem. This needs to be escalated. I am not allowed to utilize the safety features my car has to offer. Please take action and commence an investigation.

NHTSA ID Number: 11576977

Incident Date March 12, 2024

Complaint Date March 12, 2024

Vehicle Identification Number 5YFS4RCE6LP****

Summary of Complaint

Engine Coolant Bypass Valve replacement , Toyota is charging me 888 dollars for repair.

NHTSA ID Number: 11578007

Incident Date March 18, 2024

Complaint Date March 18, 2024

Vehicle Identification Number 5YFS4RCEXLP****

Summary of Complaint

I purchased my vehicle new in 2020. I am currently at 74,000 miles and noticed my engine maintenance required light come on although I received an oil change service two days prior. It's a different message from the routine maintenance. I got it checked out at Toyota today and the "engine coolant bypass valve" needed to be replaced. When I looked into it I noticed the 2020 Camry and 2020 rav 4 were recalled for the issue and repaired for free. However my model Toyota Corolla was not recalled and I had to pay \$700.82 to get it replaced at Toyota today.

NHTSA ID Number: 11578105

Incident Date March 6, 2024

Complaint Date March 18, 2024

Vehicle Identification Number JTDS4RCE3LJ****

Summary of Complaint

Had my car (Toyota Corolla 2020 SE) give a "engine maintenance required, take to a dealer" error message on my digital dashboard. No error codes from any maintenance device but apparently only the Toyota dealership can find this in the software using their computers to find it somewhere deep in there... The problem is the upper engine coolant bypass valve. This is costing me almost \$1000 including the \$80+ in diagnostics that ONLY the Toyota dealership can see and find out. Apparently this is a very common occurrence with the 4 cylinder corollas and RAV4s.

NHTSA ID Number: 11578752

Incident Date March 20, 2024

Complaint Date March 21, 2024

Vehicle Identification Number 5YFS4RCE4LP****

Summary of Complaint

My 2020 Toyota Corolla had a warning light turn on, on 3/20/2024. The warning read "Engine Maintenance Required". I looked up this issue and read that many people were having similar issues with the coolant bypass valve. I took my car to my local Toyota dealership and they confirmed it was the coolant bypass valve. The risks included in this failure can be overheating and engine damage.

NHTSA ID Number: 11579128

Incident Date March 23, 2024

Complaint Date March 24, 2024

Vehicle Identification Number JTNK4RBE8K3****

Summary of Complaint

4 years after production with approx 44k miles the car began displaying the message "engine maintained required visit dealer" after investigating discovered coolant valve was the issue. Problem seems to be a common occurrence with the model car for other owners.

NHTSA ID Number: 11579436

Incident Date March 25, 2024

Complaint Date March 26, 2024

Vehicle Identification Number JTNK4RBE2K3****

Summary of Complaint

ENGINE MAINTENANCE CAME ON, TOOK IT TO DEALERSHIP AND WAS TOLD THE DIAGNOSTIC TEST SHOWED COOLANT BYPASS VALVE. APPARENTLY THIS IS A RECURRING ISSUE AND IF NOT TAKING CARE OF, IT COULD CAUSE MAJOR PROBLEMS. I WAS TOLD THE PART IS \$200 PLUS AND LABOR IS \$500 PLUS. THIS SHOULD BE A RECALL ISSUE AND FIXED FREE OF CHARGE BY TOYOTA. IN DOING A GOOGLE SEARCH,

SEVERAL COMPLAINTS ARE LISTED REGARDING THIS ISSUE. THE GENTLEMAN AT THE DEALERSHIP WHERE I TOOK MY CAR STATED HE HAS DONE SEVERAL VEHICLES RECENTLY WITH THIS ISSUE. I DON'T THINK USE AS A CUSTOMER SHOULD HAVE TO PAY FOR THIS KNOWN ISSUE BY TOYOTA. I'M ALSO STILL WAITING TO GET THE RECALL FIXED ON MY MOTHER'S TOYOTA RAV4 RECALL WHICH I RECEIVED NOTIFICATION ON BACK IN EARLY 2023. THEIR EXCUSE IS NOT PARTS AVAILABLE. SO IN THE MEAN TIME, IF THE VEHICLE CATCHES FIRE, THEY SAY OH WELL. I AM OVER TOYOTA GETTING AWAY WITH THIS.

NHTSA ID Number: 11579594
Incident Date March 26, 2024
Complaint Date March 26, 2024
Vehicle Identification Number 5YFS4RCE0LP****
Summary of Complaint
 Engine coolant bypass valve becomes faulty at low mileage

NHTSA ID Number: 11580091
Incident Date February 19, 2024
Complaint Date March 29, 2024
Vehicle Identification Number JTDS4RCE9LJ****
Summary of Complaint
 "Engine Maintenance Required Visit Dealer" keeps popping up despite engine being fine. Another scan by my mechanic determined that the cooling bypass valve is having an issue/keeps getting stuck and triggering the maintenance alert to keep going off.

NHTSA ID Number: 11581098
Incident Date April 4, 2024
Complaint Date April 4, 2024
Vehicle Identification Number JTNK4RBE9K3****
Summary of Complaint
 Engine coolant bypass valve circuit short to battery or open - code P268115 Engine maintenance alert light appeared after (a day after, and then would not be on, and sometimes turn on, erratic maintenance message) I brought car in for scheduled engine maintenance per Toyota. The Toyota technician advised me to immediately take care of it but does not have the part in stock. This is the Toyota Dealer service in Manhattan Beach, CA.

NHTSA ID Number: 11581662
Incident Date May 19, 2023
Complaint Date April 8, 2024
Vehicle Identification Number JTDS4RCEXLJ****
Summary of Complaint
 Engine maintenance required People on internet saying that i need to change the coolant bypass valve

NHTSA ID Number: 11581838
Incident Date March 14, 2024
Complaint Date April 9, 2024
Vehicle Identification Number 5YFS4MCE3MP****
Summary of Complaint
 The engine coolant bypass valve circuit short to battery or open and lower hose - Trouble Code - DTC: P268115. The error message "Engine Maintenance Required - Visit Your Dealer" was consistently popping up and I couldn't see my speed or dash

or how many miles I had till empty even after acknowledging the message and pressing ok & back. It would stay on while my car was on no matter what. I couldn't use or see any of my information on my dash. The problem has come up multiple times by different people in the auto forum and I was warned that I would have to replace it again in 15 months. There was no light that came on on my dash just the message that would pop up and block my speed so I couldn't see how fast I was going or when I was going to be out of gas. I'm not sure if it's been inspected by the manufacturer. It first appeared after 3 years of owning my brand new car. I was very shocked that I already needed to replace a part in my engine after only having and driving my car for a short amount of time and 30,000 miles on it. It was an expensive part and caused me to have to guess how fast I was going while driving as I couldn't see or get the message to go away even after acknowledging it. I took it to Toyota and they told me the only way to get the notification to go away was to replace it but they did tell me that they have recently had multiple cars come in with the same issue. I had to drive my car in danger as I couldn't immediately afford to pay to get it fixed right away and was in college away from home and didn't have enough time to leave my car in the shop.

NHTSA ID Number: 11582261

Incident Date April 10, 2024

Complaint Date April 10, 2024

Consumer Location WHITTIER, CA

Vehicle Identification Number 5YFS4RCE4LP****

Summary of Complaint

Experience with a faulty Coolant Bypass Valve. Read enough information of this being a problem with newer toyotas (RAVs, Camrys, Corollas, etc.). Cannot get rid of Engine Maintenance Required notification on dash which pops up every 10 seconds when I'm driving after I dismiss it. This specific notificaiton is also NOT in the Toyota Manual whatsoever, and no it is not the Maintenance Service Required notification that comes up every 5,000 miles for basic check up.

NHTSA ID Number: 11582798

Incident Date April 7, 2024

Complaint Date April 13, 2024

Vehicle Identification Number JTDS4RCE9LJ****

Summary of Complaint

Dashboard stated engine maintenance required- visit your dealer and it turned out to be a bypass coolant valve malfunction per Toyota mechanic specialists.

NHTSA ID Number: 11583169

Incident Date April 14, 2024

Complaint Date April 15, 2024

Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint

Engine coolant bypass valve failed at 36,981 miles.

NHTSA ID Number: 11583316

Incident Date April 14, 2024

Complaint Date April 16, 2024

Vehicle Identification Number JTDS4RCE4LJ****

Summary of Complaint

Engine maintenance required light comes on and it wont go away. Happened around 65000 miles. It is cracked engine coolant bypass valve. It is happening to all toyota corolla 2020s. Dealer is asking \$1200 to fix it.

NHTSA ID Number: 11583816

Incident Date April 17, 2024

Complaint Date April 18, 2024

Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint

The engine coolant bypass valve needed replacement at around 70,000 miles. Similar replacement have been needed in other corollas models of the same year.

NHTSA ID Number: 11584356

Incident Date April 21, 2024

Complaint Date April 21, 2024

Vehicle Identification Number JTDS4RCE0LJ****

Summary of Complaint

engine coolant bypass valve issues under 70k miles

NHTSA ID Number: 11584448

Incident Date April 15, 2024

Complaint Date April 22, 2024

Vehicle Identification Number JTDS4RCE3LJ****

Summary of Complaint

Warning display message "Engine Maintenance Required Visit Your Dealer". After diagnostic at the dealer, coolant bypass valve failed and needed replacement with hefty, almost \$900.00 for parts and labor cost. Did research online, and it seems that more vehicles from the year 2020-2021 have experienced the same issue at 30-55k miles, my car is on 106k miles. Please do a recall for this issue and extend warranty to \$200k miles. This car should not have this sort of issue!

NHTSA ID Number: 11584948

Incident Date April 24, 2024

Complaint Date 24, 2024

Vehicle Identification Number JTDS4RCE6LJ****

Summary of Complaint

An engine maintenance required popped up in the vehicle and was unable to be removed Took the vehicle to get checked at a Toyota dealership and they advised it was the coolant valve bypass was faulty

NHTSA ID Number: 11585089

Incident Date April 15, 2024

Complaint Date April 24, 2024

Vehicle Identification Number JTDS4RCE2LJ****

Summary of Complaint

Maintenance required please see dealer message pops up and cannot be dismissed. Coolant sensor bypass valve is damaged.

NHTSA ID Number: 11585595

Incident Date April 19, 2024

Complaint Date April 27, 2024

Vehicle Identification Number JTDS4RCE2LJ****

Summary of Complaint

My engine maintenance required screen came on in my car. When I ran the diagnostic, they stated that the coolant bypass valve needs to be replaced in order to prevent the engine from overheating. This seems to happen on all of the 2020 and 2021 Toyota Corollas.

NHTSA ID Number: 11585936

Incident Date April 24, 2024

Complaint Date April 29, 2024

Vehicle Identification Number JTDS4RCE7LJ****

Summary of Complaint

Known issue in certain Toyota models and years that the coolant bypass valve fails causing a "Engine Maintenance is Required. See Dealer." Toyota is well aware of the issue but has yet to fix the problem as driving with a failed coolant part for too long could cause overheating.

NHTSA ID Number: 11586250

Incident Date April 30, 2024

Complaint Date May 1, 2024

Vehicle Identification Number JTDP4RCE9LJ****

Summary of Complaint

Coolant bypass valve failure. Dealer (Atkins Kroll, Toyota Guam) is conveniently charging me over \$600 for repair for a common issue for vehicles of this generation.

NHTSA ID Number: 11586995

Incident Date May 4, 2024

Complaint Date May 4, 2024

Vehicle Identification Number JTDT4RCE0LJ****

Summary of Complaint

At 4 years and 1/2 old car 2020 Corolla XSE an Engine Maintenance Required SEE DEALER light turned on. Did diagnostic with OBD 2 scanner at two locations auto body shop and Uto zone. Nothing appears. It is in fact a NEEDED future recall since thousands if not more people have encountered the same. It is a Coolant By Pass Valve. Cost is only \$99.53 + tax at dealer. Problem is that should be under warranty or extended warranty or recall. Dealer likes to charge \$800 (180-200 for diagnostic, \$110 part, \$400 labor. Part only takes 30 minutes to install. I should be able to buy at dealer for \$110 and have them install for free or pay 30 minutes of work time = \$85. 1 hour is about \$175. So instead of trying to be billed \$800 I should only be billed for \$85 labor (30 minutes) + \$110 part = Brand total of \$105 USD. My daughter [XXX] and I, [XXX] (dad) bought the car at Longo Toyota El Monte, CA 91731.

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11587551

Incident Date May 7, 2024

Complaint Date May 7, 2024

Vehicle Identification Number JTDS4RCE6LJ****

Summary of Complaint

The Engine Coolant Bypass Valve Short in the vehicle has malfunctioned. This appears to be widespread issue not only in the Corolla, but in the Camry and RAV4, and appears to affect model years 2019-2024. This issue caused coolant leakage, has the potential to cause issues with the engine, and affects the A/C/Heating systems as well. There were no warning signs prior to the failure, and the car had just passed a multi point inspection 4 days prior to the failure. The problem has been reproduced by my local Toyota dealership.

NHTSA ID Number: 11587729

Incident Date May 7, 2024

Complaint Date May 8, 2024

Vehicle Identification Number JTNC4RBE0L3****

Summary of Complaint

Engine coolant valve is broken. Part of power train as it cools circuits for the power train.

NHTSA ID Number: 11588615

Incident Date May 3, 2024

Complaint Date May 14, 2024

Vehicle Identification Number JTDS4RCE6LJ****

Summary of Complaint

Check engine light is giving a false positive. There is something wrong with the coolant bypass valve. I checked online and this is not an isolated event.

NHTSA ID Number: 11588845

Incident Date May 1, 2024

Complaint Date May 15, 2024

Vehicle Identification Number JTDS4RCE5LJ****

Summary of Complaint

Coolant bypass valve failed at 52k miles.

NHTSA ID Number: 11589408

Incident Date May 11, 2024

Complaint Date May 18, 2024

Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint

coolant bypass valve issue under 60k miles.

NHTSA ID Number: 11589458

Incident Date May 17, 2024

Complaint Date May 18, 2024

Vehicle Identification Number JTDP4RCE0LJ****

Summary of Complaint

Engine maintenance required . bypass coolant valve defected

NHTSA ID Number: 11589648

Incident Date May 19, 2024

Complaint Date May 20, 2024

Vehicle Identification Number 5YFS4RCE5LP****

Summary of Complaint

At 55K miles for my 2020 Toyota Corolla, the Engine Maintenance Required notification popped up on my screen and is not removable. Upon further verification numerous 2020-2021 corollas have been having this issue at similar amounts of mileage. It is a faulty Engine Coolant Bypass Valve that needs to be replaced. If I were to take it in to a dealership, they would charge \$500+ just as they have for many others when it should really be a recall. As of now I have not taken it to be inspected due to fear of steep labor costs. My safety is at risk because if this does not get replaced my engine will overheat causing total failure of the car, and as a 2020 model with such low mileage, this is ridiculous.

NHTSA ID Number: 11589793

Incident Date May 20, 2024

Complaint Date May 20, 2024

Vehicle Identification Number JTDS4RCE1LJ****

Summary of Complaint

The coolant bypass valve was constructed of poor quality plastic, and has cracked at a mere 50,000 miles. It's Leaking coolant into the sensor. Along with potentially causing major damage to the engine.

NHTSA ID Number: 11589815

Incident Date May 13, 2024

Complaint Date May 21, 2024

Vehicle Identification Number JTNK4RBE6K3****

Summary of Complaint

Coolant valve is faulty.

NHTSA ID Number: 11589830

Incident Date May 21, 2024

Complaint Date May 21, 2024

Vehicle Identification Number 5YFS4MCE3MP****

Summary of Complaint

Engine coolant bypass valve short to battery. Throwing code - P2681-15 at 33,000 miles.

NHTSA ID Number: 11590189

Incident Date May 18, 2024

Complaint Date May 22, 2024

Vehicle Identification Number JTDS4RCE4LJ****

Summary of Complaint

"Engine Maintenance Required - Visit Your Dealer" message popped up on my car's (Toyota Corolla 2020) dashboard all of a sudden and I didn't have any issues with engine before. I brought up my card to Toyota Service Center in Sunnyvale, CA and they told me that my car's coolant bypass valve has to be replaced and re-check if it's needed which is an uncertain thing and advised me not driving the car as it may damage the cooling system components or even the engine itself. All of these will cost me 911.58\$ which is too much but it's not all yet. I was researching this issue on the Internet and figured out that many people who has the Corolla 2020 and 2021 had the exact same issue. I don't think it's a coincidence. People also complaining about the same issue for Toyota Rav4 and Toyota Camry. I don't want to pay so much money which is almost 1k. I never had any accidents and or crashes. [XXX] [XXX] [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

NHTSA ID Number: 11590704

Incident Date May 8, 2024

Complaint Date May 25, 2024

Vehicle Identification Number 5YFS4RCE8LP****

Summary of Complaint

Coolant bypass valve bad at 26000 miles

NHTSA ID Number: 11591416

Incident Date May 18, 2024

Complaint Date May 29, 2024

Vehicle Identification Number JTDS4RCE7LJ****

Summary of Complaint

Engine maintance required/coolant bypass valve issue

NHTSA ID Number: 11591231

Incident Date May 15, 2024

Complaint Date May 29, 2024

Vehicle Identification Number JTNK4RBEXK3****

Summary of Complaint

1 The bypass coolant valve has failed. Car displays message stating engine maintenance
 2 required but no other warning signs. Diagnostic test proved that it's the bypass
 3 coolant valves. Upon further research this seems to be a frequent problem on the 2019
 4 to 2022 Toyotas.

5 **NHTSA ID Number:** 11591354

6 **Incident Date** May 18, 2024

7 **Complaint Date** May 29, 2024

8 **Vehicle Identification Number** 5YFS4MCE4MP****

9 **Summary of Complaint**

10 Coolant bypass valve stuck shut at 65k miles. Seems like it's a common occurrence
 11 with newer Toyotas. Was told to report it as a safety issue.

12 81. In addition to being on notice of the Defect through NHTSA and other
 13 complaints, Defendants also directly learned of the Defect from their network of dealerships.
 14 Many of the customers who wrote online or to Toyota about their negative experiences with
 15 the Defect reported having taken their Class Vehicles into Toyota dealerships because of the
 16 Defect.

17 82. Further, the internet is replete with examples of blogs and other websites where
 18 Class Members have complained of the exact same Defect in the Class Vehicles. A sampling
 19 of those complaints is included below:

20 a. On April 15, 2021, a consumer wrote: "My 2020 Corolla SE has 73296 miles
 21 and suddenly displayed Engine Maintenance Required message 1500 miles after
 22 last oil change. The dealer clear the code p2688115 but it came back few minutes
 23 later. Did someone experienced it?"⁹

24 b. On April 22, 2022, a consumer wrote: "I got DTC P2681-15 on my car today
 25 which means it's time to change the coolant bypass valve. The only problem is
 26 I can't tell if I'm blind or what but I can't find it. On my previous cars it was
 27 kinda sitting up top near the front. could someone please point it out in a picture
 28 and the part number if you have it? Thank you."¹⁰

⁹ <https://www.toyotanation.com/threads/code-p2688115-cleared-tested-but-still-coming-back.1697350/> (last visited May 14, 2024)

¹⁰ <https://www.toyotanation.com/posts/14625169/> (last visited May 14, 2024)

- 1 c. In or around May 2022, a consumer wrote: “My 2020 with 47k miles needed the
 2 coolant bypass valve replaced. Toyota said the power train warranty wouldn’t
 3 cover it... so 600 dollars later it’s fixed. I’ve seen other post that this is becoming
 4 a common issue. Hopefully it recalls soon for I can get my money back. Also
 5 the only reason I found out it was bad. I had an engine maintenance required
 6 messaged that would not go away. I thought it was the service message but it
 7 wouldn’t clear. So after doing some research it seems that message is for this
 8 issue.”¹¹
- 9 d. On December 15, 2022, a consumer wrote: “So frustrated with this situation.
 10 The "engine maintenance required" warning comes on whenever the AC is
 11 turned on. The warning cannot be reset by the normal means but can be reset
 12 (usually) by turning the car off. The dealership says the issue is the coolant
 13 bypass valve, and the only fix is a replacement (at about \$700). I see no options
 14 but to just get over my anger/disappointment about replacing a part that is less
 15 than 3 years old and replace it?”¹²
- 16 e. On April 5, 2023, a consumer wrote: “Help! Check engine light 35k miles,
 17 Engine Coolant Bypass Valve? Hey, I need help and if this is an easy fix. I have
 18 a check engine light come on only when I turn the AC on. the dealer said it was
 19 the engine coolant bypass valve and quoted me at \$900 crazy. Is this something
 20 I can fix myself? I have a 2020 SE with only 35k miles and the VINN starts with
 21 a 5. Any pictures or advice to anyone who experienced this thank you for any
 22 help!”¹³

25 ¹¹ https://www.reddit.com/r/rav4club/comments/y7u9a9/2020_coolant_bypass_valve_replaced/ (last
 26 visited May 14, 2024)

27 ¹² [https://www.reddit.com/r/Toyota/comments/zmq97z/2020_rav4_coolant_bypass_valve_replacement
 28 /?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button](https://www.reddit.com/r/Toyota/comments/zmq97z/2020_rav4_coolant_bypass_valve_replacement/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button) (last visited May 14, 2024)

¹³ <https://www.toyotanation.com/posts/14811261/> (last visited May 14, 2024)

1 f. On April 16, 2023, a consumer wrote: “This bypass valve is used on our 5th gen
 2 RAVs and the SAME valve is also on the latest generation of Camrys and
 3 Corollas. I can't say whether the valve failure is "common" but its been reported
 4 multiple times both here and on the Toyota Nation forum and Reddit Rav4 Club
 5 in all three models of Toyota. Some cars have failures at low mileage and some
 6 at high--there is no pattern. Some high mileage cars NEVER had a failure. There
 7 is NO way to tell if the valve is cracking and/or shorting out its electrical
 8 connector. I suppose if you periodically inspect the valve you may see coolant
 9 leakage if the crack is EXTERNAL--but sometimes they fail internally and
 10 corrode or foul the electrical connector. The first you will know of the valve
 11 failure is the MID screen warning "ENGINE maintenance required" (and only
 12 when running the A/C or heater) and this is different from the usual
 13 "maintenance required" oil change 5000 mile warning.”¹⁴

14 g. In or around May 2023, a consumer wrote: “Vehicle is a 2019 RAV4, odometer
 15 reads 41,600. I’ve had a persistent “Engine Maintenance Required” notification
 16 on the MID screen for the last 1700 miles or so, literally the day after getting a
 17 scheduled service at the dealer. I initially thought it was just the service
 18 reminder, so I didn’t think much of it, and just ignored it. But eventually it
 19 became so annoying that I tried to clear the notification, and couldn’t-- and upon
 20 further research, it turns out the notification is probably the result of a leaking
 21 coolant bypass valve. Seems like every RAV4 owner and their mother is having
 22 the same issue with these cheap, plastic components. I haven’t noticed any loss
 23 in coolant, haven’t experienced any abnormal engine temps, and haven't had any
 24 CELs. I’ve also noticed that the notification only comes on now when I have the
 25 A/C turned on.”¹⁵

26
 27 ¹⁴ [https://www.rav4world.com/threads/coolant-flow-valve-and-bleed-coolant-system-difficult-to-](https://www.rav4world.com/threads/coolant-flow-valve-and-bleed-coolant-system-difficult-to-fix.321806/page-3)
 28 [fix.321806/page-3](https://www.rav4world.com/threads/coolant-flow-valve-and-bleed-coolant-system-difficult-to-fix.321806/page-3) (last visited May 14, 2024)

¹⁵

h. On May 24, 2023, a consumer wrote: “So my 2020 Corolla with only 30k miles on just recently had the check engine/drive start control malfunction/engine maintenance required lights all come on at the same time. I scanned it and found the codes P26AC11, P268111 “Engine coolant bypass valve circuit short to ground”. I checked both valves and the top one behind the engine was leaking coolant into the wire harness port, which cause a short and corroded the pins/connector. I bought a new valve from the dealership, but they apparently don’t sell the new wire harness, so they sold me the plastic plug parts of the harness, as well as 2 grey wires that have the right connectors, but are 1-2 gauge bigger than the originals. I put the new harness together, making sure I matched the colors to how they were on the old connector, then the code went away for about a day and a half. I now have the code P26AD “Engine coolant bypass valve B control circuit low”. I re-spliced the wires to make sure that the connection was good, and tested them for continuity/voltage/fuses. Continuity is good, fuses are good and voltage comes up as 12.7v on the red wire, and .20V on the blue wire. I’m not sure what they’re supposed to be at, or what is causing the issue. Of course I can’t get a wiring diagram or anything since the vehicle is still new. Would it be possible that the 1-2 gauge bigger wire (small to big wire) cause an issue with low voltage? I wouldn’t think so, but I’m not an electrician. Any help would be appreciated.”¹⁶

i. In or around July 2023, a consumer wrote: “My 2019 RAV4 XLE with 35k has same problem since last fews weeks.dealer ship ask for 800 something to fix, but i try to change the coolant bypass valve later. when i unplug the connector

¹⁶ https://www.reddit.com/r/rav4club/comments/14491xh/toyota_coolant_bypass_valve_issue/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May 14, 2024)

¹⁶ <https://www.toyotanation.com/posts/14840557/> (last visited May 14, 2024)

from the coolant bypass valve and start the car, the message is gone.. and it plus in , the message comes out again.”¹⁷

j. In or around September 2023, a consumer wrote: “My Rav4 2019 had the same alert message in my dash to take to the dealer. They diagnosed and said it was the coolant bypass. The dealer said that I should keep my receipt for the future because this is such a common problem that they may do a future recall and I will be reimbursed. Hopefully there is a class action.”¹⁸

k. On September 1, 2023, a consumer wrote: “I got the dreaded ‘engine maintenance required’ message on my dash last weekend, (different than the regular ‘maintenance required’ message for oil changes), no engine check light on, and dealership diagnosed it and confirmed it was the coolant bypass valve needing to be replaced. Not covered under my powertrain warranty of course, so part and labor all together plus tax I’m looking at almost \$1000 for it total. How hard is this to replace by oneself? How dire of a problem is this to fix right away? Can this wait to be fixed for a month or two so we can save the money up to fix it?”¹⁹

l. In or around October 2023, a consumer wrote: “I have a 2020 Rav 4 LE, dealing with the exact same situation. Dealer wants almost 700.0 to fix it, both powertrain warranty and the 5 yr/36k mile doesn’t cover the cost for repairs.

¹⁷

https://www.reddit.com/r/rav4club/comments/y7u9a9/comment/jtcjeya/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May 14, 2024)

¹⁸

https://www.reddit.com/r/rav4club/comments/14491xh/comment/k2ldu3j/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May 14, 2024)

¹⁹ https://www.reddit.com/r/rav4club/comments/167gy66/coolant_bypass_valve_failure_help/ (last visited May 14, 2024)

Only 30,000 miles on the Fing thing! Michale's Toyota of Bellevue in Washington state. So frustrating"²⁰

m. In or around January 2024, a consumer wrote: "As you may have noticed or have been affected the check engine light may turn on and display visit the dealer around 30-55k miles. Multiple people reported the coolant bypass issue in this forum and in others after running the diagnostics. It's not covered under power terrain but it may be for extended warranty. Mine occurred around 45k miles and the cost was steep ~\$800 for a 2021 toyota corolla at the dealer. If you experienced this please report it to the NHTSA to open an investigation and possible recall. This also affects RAV4s and Camrys from what I researched of similar years in this generation. It may be an easy fix if you find the part to replace but some people are recommending to replace the part + hose since it may occur again."²¹

n. In or around January 2024, a consumer wrote: "I recently had my check engine light come on and my local toyota dealership had an offer for a free diagnostic check so when I took it in they told me that the engine coolant bypass valve needed to be replaced but they wanted close \$900 to fix the issue. I ended up taking it to another shop that could fix it for about half the cost however after the repair the check engine light is still on and I am getting a diagnostic code of P26AE still. Does anyone know what might still be causing the check engine light to come on even after the part was repaired? Car has around 100k miles on

²⁰

https://www.reddit.com/r/rav4club/comments/14491xh/comment/k6m9zrj/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May 14, 2024)

²¹

https://www.reddit.com/r/COROLLA/comments/18ojv0/toyota_corolla_20202021_engine_coolant_bypass/ (last visited May 14, 2024)

it, is running fine, no noises, has not been running hot, no leaks that I can tell of either.”²²

o. In or around April 2024, a consumer wrote: “Mine this problem now. AC blows hot along with Engine Maintenance Required message. I had called in to the dealership when the message came up, and mentioned the message and they said “Oh, sure. That’s just the extra reminder to tell you that you REALLY need to do your oil change. I laughed at this because I had just done an oil change and had reset the Maintenance Required message already. I said I would come in to show them what i meant. I pointed out to the service department that this message was not the same as the scheduled maintenance reminder but they assured me there was nothing else wrong. Frustrated, i went home and looked it up. Coolant bypass valve failure is what prompts this message, or so i gathered from the web. Oddly, OBD reader showed no codes at all (?) My car didn’t behave any differently besides the ding and the message as soon as i turned on the AC. I read also that one can drive around with this issue for up to six months (didn’t have the money to fix right away). It is maybe three weeks later and as of today, the AC does not work at all. Sucks but I still don’t have the money to fix it. Sigh.”²³

83. Further, upon information and belief, Toyota itself has seen a significant increase in warranty claims relating to the Defect. The NHTSA complaints reproduced above indicate that dealerships are unable to order replacement coolant bypass valves because of a significant backorder.

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²²

https://www.reddit.com/r/autorepair/comments/190btr4/2018_toyota_camry_coolant_bypass_valve_issue/ (last visited May 14, 2024)

²³

https://www.reddit.com/r/COROLLA/comments/18ojjv0/comment/kyovah2/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button (last visited May 14, 2024)

84. Despite Defendants' knowledge of the Defect, they failed to disclose it to Plaintiffs and other Class Members.

4. Toyota's History of Coolant System Issues

85. Toyota knew or should have known about the Defect due to the other problems it has encountered with the coolant system in its vehicles.

86. In February of 2020, Toyota recalled approximately 44,000 vehicles because of a defect that caused certain vehicles "with engine blocks containing higher porosity levels" to "create cracks in the cooling passages, resulting in coolant leaking internally and/or externally. See Exhibit 2.

87. Among the impacts, Toyota acknowledged leaking coolant could cause "engine noise, engine smoke, warning lights/malfunction indicator illumination, and audible chime sounding, and/or, in some cases, engine overheating and possible internal mechanical damage (e.g. seizing of internal engine components)". Toyota further acknowledged that engine overheating could cause "a vehicle stall while driving at higher speeds . . . without prior warning to the driver, increasing the risk of crash" and that internal mechanical engine damage could "potentially cause engine oil to leak, which, in the presence of an ignition source, can lead to an increased risk of fire."

88. Toyota first learned of the coolant defect in these vehicles in September of 2019. Between September 2019 and January 2020, Toyota conducted testing and failure mode analyses on the root cause of the defect, which led it to "conduct a voluntary safety recall campaign" of the affected vehicles. The scope of the impacted vehicles includes the 2019-2020 Toyota RAV4, thus alerting Toyota to coolant related issues in those vehicles as well as the dangers of a coolant leak in its vehicles generally.

89. Toyota's history of investigating, testing, and identifying design and/or manufacturing defects contained in its vehicles establishes that Toyota knew or should have known of the Defect in the Class Vehicles.

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D. Toyota Conceals the Defect and Continues Selling Class Vehicles

90. Toyota describes its vehicles as being quality, dependable, and reliable.²⁴

91. Defendants could have provided Class Vehicle owners and lessees with adequate and satisfactory notice of the Defect, including through their sales and marketing representations, their network of agents and dealers, in owners' manuals, on their website, in Class Vehicle brochures, and on the window stickers. Instead of notifying the public and/or the Class of the Defect, Defendants actively concealed this material information and continued to sell and lease Class Vehicles.

92. Despite Toyota's representations of reliability and safety, the Defect prevents the coolant system in the Class Vehicles from working as directed and poses a potential safety hazard for Class Members who may experience engine stalling and/or engine failure if the engines in the Class Vehicles overheat.

93. Nor has Toyota developed an effective fix for the sudden failures the Defect causes. Toyota dealerships are instructed to replace the defective coolant bypass valves with the same defective valves, which means that consumers will inevitably need to replace the valves again in the future.

94. As a consequence of Toyota's actions and inaction, Class Vehicle owners have been deprived of the benefit of their bargain, lost full use of their Class Vehicles, and incurred lost time and out-of-pocket costs, including payments for (1) the costs for diagnosis and (2) the costs to make the necessary repairs. The Class Vehicles have also suffered a diminution in value due to the Defect.

95. Had Plaintiffs and Class Members known about the Defect, they would not have purchased or leased their Class Vehicles or would have paid significantly less for them.

E. Defendants' Warranty Practices

96. In its New Vehicle Limited Warranty, Toyota agrees to repair defects reported within the earlier of three years or 36,000 miles. The Warranty Information Booklet included

²⁴ See, e.g., *supra* note 4, 5.

1 with all Class Vehicles provides that, “[t]his warranty covers repairs and adjustments needed
 2 to correct defects in materials or workmanship of any part supplied by Toyota, subject to the
 3 exceptions indicated under “What Is Not Covered” on pages 14–15.” The listed exceptions do
 4 not apply here. *See* Exhibit 3.

5 97. Toyota also provides an Emission Defect Warranty, which provides coverage
 6 for the earlier of two years or 24,000 miles such that the Class Vehicles were “designed, built
 7 and equipped to conform at the time of sale with applicable federal emissions standards,” as
 8 well as “free from defects in materials in workmanship that may cause the vehicle to fail to
 9 meet these standards.” Ex 3, at 17. In addition, certain components receive coverage for the
 10 earlier of eight years or 80,000 miles, including the “sensors, solenoids, switches *and valves*.”
 11 **Ex. 3, at 19.**

12 98. Toyota evades its warranty obligations by claiming that the Defect is not a defect,
 13 and thus denies warranty coverage to repair the Defect.

14 99. Moreover, some Class Vehicles manifest the Defect just outside Defendants’
 15 warranty period. But the mileage and temporal limitations Defendants impose on their
 16 warranty are unconscionable and unenforceable.

17 100. Defendants provide the New Vehicle Limited Warranty and Emission Defect
 18 Warranty (together, the “Warranty”) to buyers after a purchase is complete. Buyers like
 19 Plaintiffs and Class Members lack pre-sale knowledge of the Defect or the ability to bargain
 20 as to the terms of the Defendants’ Warranty. Accordingly, the limitations Defendants impose
 21 on the Warranty—and their efforts to disclaim any implied warranties—are procedurally
 22 unconscionable because there was unequal bargaining power between Defendants and
 23 Plaintiffs and the Class Members, because, at the time of purchase, Plaintiffs and the other
 24 Class Members had no other options for purchasing from Defendants alternative warranty
 25 coverage for the Class Vehicles.

26 101. All of the purported limitations on the Warranty, including the time and mileage
 27 limits, are also substantively unconscionable. Defendants knew Class Vehicles suffered from
 28 the Defect and that the Defect would continue to pose safety risks after the Warranty

1 purportedly expired, yet failed to disclose the Defect to Plaintiffs and the other Class Members
 2 while continuing to market Class Vehicles as dependable and reliable. Defendants'
 3 enforcement of those limitations is thus harsh and shocks the conscience.

4 102. Defendants' efforts to evade their Warranty obligations with respect to the
 5 known Defect, coupled with their refusal to cover the Defect if it manifests outside the
 6 warranty's stated term, deprives Plaintiffs and Class Members of the benefit of their bargain,
 7 forcing them to pay out of pocket to repair a defect present in Class Vehicles at the time of
 8 purchase.

9 VI. CLASS ACTION ALLEGATIONS

10 103. Plaintiffs bring this action individually and on behalf of a nationwide class
 11 pursuant to Rules 23(a), 23(b)(2), and/or 23(b)(3) of the Federal Rules of Civil Procedure.

12 Nationwide Class:

13 All persons in the United States who bought or leased a Class Vehicle.

14 104. In addition, pursuant to Fed. R. Civ. P. 23(c)(5), state subclasses are defined as
 15 follows:

16 California Subclass:

17 All persons who are: (1) current or former owners and/or lessees of a Class
 18 Vehicle; and (2) reside in California or purchased a Class Vehicle for primarily
 19 personal, family or household purposes, as defined by California Civil Code §
 1791(a), in California.

20 Florida Subclass:

21 All persons who bought or leased a Class Vehicle in the state of Florida.

22 105. Excluded from the Class are Defendants, any affiliates, employees, officers and
 23 directors; persons or entities that purchased the Class Vehicles for resale; and the Judge(s)
 24 assigned to this case. Plaintiffs reserve the right to modify, change, or expand the class
 25 definitions in light of discovery and/or further investigation.

26 106. Numerosity: The Class is so numerous that joinder of all members is
 27 impracticable. While the exact number and identities of individual members of the Class is
 28 unknown at this time, as such information is in the sole possession of Defendants and is

obtainable by Plaintiffs only through the discovery process, publicly available sales information shows that Defendants sold or leased hundreds of thousands of Class Vehicles nationwide. Members of the Class can be readily identified based upon, *inter alia*, the records (including databases, e-mails, and dealership records and files) maintained by Toyota in connection with its sales and leases of Class Vehicles.

107. **Existence and Predominance of Common Questions of Fact and Law:**

Common questions of law and fact exist as to all members of the Class and predominate over any individual questions. These common legal and factual questions include, but are not limited to:

- a. whether Toyota engaged in the conduct alleged herein;
- b. whether Class Vehicles are unfit for their ordinary purpose;
- c. whether Toyota placed Class Vehicles into the stream of commerce in the United States with knowledge of the Defect;
- d. whether Toyota knew or should have known of the Defect, and if so, for how long;
- e. when Toyota became aware of the Defect in the Class Vehicles;
- f. whether Toyota knowingly failed to disclose the existence and cause of the Defect in the Class Vehicles;
- g. whether Toyota's conduct alleged herein violates consumer protection laws, warranty laws, and other laws as asserted herein;
- h. whether Plaintiffs and Class Members overpaid for their Class Vehicles as a result of the Defect;
- i. whether Plaintiffs and Class Members have suffered an ascertainable loss as a result of their loss of their Class Vehicles' features and functionality;
- j. whether Plaintiffs and Class Members are entitled to damages, including punitive damages, as a result of Toyota's conduct alleged herein, and if so, the amount or proper measure of those damages; and

1 k. whether Plaintiffs and Class Members are entitled to equitable relief, including
2 but not limited to restitution and/or injunctive relief.

3 108. **Typicality**: Plaintiffs' claims are typical of the claims of the Class because the
4 Plaintiffs purchased a Class Vehicle containing the Defect, as did each member of the Class.
5 Plaintiffs and Class Members sustained economic harm in the same manner by Toyota's
6 uniform course of conduct alleged herein. Plaintiffs and Class Members have the same or
7 similar claims against Toyota relating to the conduct alleged herein, and the same conduct on
8 the part of Toyota gives rise to all the claims for relief.

9 109. **Adequacy**: Plaintiffs are adequate representatives of the Class, whose interests
10 do not conflict with those of any other Class Member. Plaintiffs have retained counsel
11 competent and experienced in complex class action litigation—including consumer warranty
12 and automobile defect class actions—who intend to prosecute this action vigorously. The
13 interests of the Class will be fairly and adequately protected by Plaintiffs and their counsel.

14 110. **Superiority**: A class action is superior to all other available means of fair and
15 efficient adjudication of the claims of Plaintiffs and members of the Class. The injury suffered
16 by each individual Class Member is relatively small in comparison to the burden and expense
17 of individual prosecution of these claims, including from the need for expert witness testimony
18 on highly technical and economic issues bound up with the claims. Individualized litigation
19 also would risk inconsistent or contradictory judgments and increase the delay and expense to
20 all parties and the courts. By contrast, a class action presents far fewer management difficulties
21 and provides the benefits of single adjudication, economies of scale, and comprehensive
22 supervision by a single court.

23 111. **Injunctive Relief**: Toyota has acted, and refuses to act, on grounds generally
24 applicable to the Class, thereby making appropriate final equitable relief with respect to the
25 Class as a whole.

CLAIMS FOR RELIEF**COUNT I****VIOLATION OF MAGNUSON-MOSS WARRANTY ACT (“MMWA”)****(15 U.S.C. §§ 2301 *ET SEQ.*)****(NATIONWIDE CLASS)**

112. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

113. Plaintiffs bring this claim on behalf of themselves and the Class.

114. Plaintiffs are “consumers” within the meaning of the MMWA, 15 U.S.C. § 2301(3).

115. Toyota is a “supplier” and “warrantor” within the meaning of the MMWA, 15 U.S.C. § 2301(4)-(5).

116. The Class Vehicles are “consumer products” within the meaning of the MMWA, 15 U.S.C. § 2301(1).

117. 15 U.S.C. § 2310(d) provides a cause of action for any consumer who is damaged by the failure of a warrantor to comply with a written or implied warranty.

118. Toyota’s express warranties are written warranties within the meaning of the MMWA, 15 U.S.C. § 2301(6). The Class Vehicles’ implied warranties are covered under the MMWA, 15 U.S.C. § 2301(7).

119. Toyota breached its express and implied warranties as described in more detail above. Without limitation, the Class Vehicles contain the Defect, which renders the vehicles unsafe and unfit for their intended use. Toyota refused to honor its warranties by repairing or replacing the defective components.

120. Toyota directly communicated with Plaintiffs via its television, print, and online advertisements. Toyota also issued vehicle warranties directly to Plaintiffs. Plaintiffs and other Class Members also relied on Toyota’s direct representations regarding the high quality, durability, reliability, dependability, and functionality of Toyota vehicles in making their purchasing decision.

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121. Plaintiffs afforded Toyota a reasonable opportunity to cure its breach of written warranties and any further opportunity would be unnecessary and futile here as Toyota has failed to remedy the Defect.

122. At the time of sale or lease of each Class Vehicle, Toyota knew, should have known, or was reckless in not knowing of its misrepresentations and omissions concerning the Class Vehicles' inability to perform as warranted, but it nonetheless failed to fix the Defect and/or disclose the Defect. Under the circumstances, the remedies available under any informal settlement procedure would be inadequate, and any requirement that Plaintiffs resort to an informal dispute resolution procedure under the MMWA and/or afford Toyota a reasonable opportunity to cure its breach of warranties is excused and thereby deemed satisfied.

123. The amount in controversy of Plaintiffs' individual claims meets or exceeds the sum of \$25. The amount in controversy of this action exceeds the sum of \$50,000, exclusive of interest and costs, computed on the basis of all claims to be determined in this lawsuit.

124. Plaintiffs individually and on behalf of the other Class Members, seeks all damages permitted by law, including diminution in value of the Class Vehicles, in an amount to be proven at trial.

COUNT II
BREACH OF EXPRESS WARRANTY
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

125. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

126. Plaintiffs bring this claim individually and on behalf of the State Subclasses.

127. Toyota is a "merchant" as defined under the Uniform Commercial Code ("UCC").

128. The Class Vehicles are "goods" as defined under the UCC.

129. Toyota provides a Limited Warranty and Emission Defect Warranty (together, the "Warranty") with every Class Vehicle that expressly warrants that Toyota will repair any defects in materials and/or workmanship free of charge during the applicable warranty periods.

1 The Defect is a defect in material and/or workmanship, and therefore should have been
2 repaired at no cost under the Warranty. Further, the Defect causes increased emissions, and
3 thus violates the Emission Defect Warranty because the vehicle does not conform with federal
4 emissions standard.

5 130. Toyota breached its written warranties by failing to provide an adequate repair
6 when Plaintiffs and the Class Members presented their Class Vehicles to authorized Toyota
7 dealers following manifestation of the Defect. Despite its knowledge that Plaintiffs' and Class
8 Members' vehicles were exhibiting the symptoms of the Defect, instead of providing an
9 effective repair, Toyota claimed that the necessary repairs would not be covered under
10 Warranty.

11 131. Toyota failed to perform its Warranty obligations as part of a uniform pattern
12 and practice that extended to all of its dealerships.

13 132. The Warranties formed the basis of the bargain that was reached when Plaintiffs
14 and Class Members purchased or leased their Class Vehicles. Plaintiffs and Class Members
15 experienced the Defect within or shortly after the warranty period and presented their Class
16 Vehicles for repairs. Despite the existence of the Warranties, Toyota failed to inform Plaintiffs
17 and Class Members of the Defect and failed to adequately repair the Defect.

18 133. As a result of Toyota's breach of its express warranty, Plaintiffs and Class
19 Members have suffered economic damages including, but not limited to, the loss of the benefit
20 of their bargain, loss of vehicle use, diminished value, substantial loss in value and resale
21 value, out-of-pocket expenses for maintenance and service expenses to fix the Defect, as well
22 as towing, roadside assistance, and alternative transportation costs that they otherwise would
23 not have incurred but for the Defect.

24 134. Toyota was provided notice of the issues complained of herein within a
25 reasonable time by numerous complaints online, directly to Toyota and its authorized dealers,
26 Class Members taking their vehicles to its dealers, and by direct written notice by Plaintiff
27 Barrientos.
28

135. Plaintiffs and Class Members have complied with all obligations under the Warranty or otherwise have been excused from performance of such obligations as a result of Toyota's conduct described herein.

136. In its capacity as a supplier and/or warrantor, and by the conduct described herein, any attempt by Toyota to limit its express warranty in a manner that would exclude or limit coverage for the Defect, including benefit-of-the-bargain, incidental, or consequential damages, would cause the warranty to fail of its essential purpose. Plaintiffs and Class Members have presented their Class Vehicles to Toyota's authorized dealers and Toyota has failed to remedy the Defect. As a result, Plaintiffs and Class Members are left with defective vehicles that do not function as intended and, therefore, have been deprived of the benefit of their bargains.

137. In its capacity as a supplier and/or warrantor, and by the conduct described herein, any attempt by Toyota to limit its Warranty in a manner that would exclude or limit coverage for the Defect would be unconscionable. Toyota's Warranties were adhesive and did not permit negotiations. Toyota possessed superior knowledge of the Defect, which is a latent defect, prior to offering Class Vehicles for sale. Toyota concealed and did not disclose this Defect, and Toyota did not remedy the Defect prior to sale (or afterward).

COUNT III
BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

138. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

139. Plaintiffs bring this claim individually and on behalf of the State Subclasses.

140. Toyota is a "merchant" as defined under the UCC.

141. The Class Vehicles are "goods" as defined under the UCC.

142. A warranty that the Class Vehicles were in merchantable quality and condition arises by operation of law with respect to transactions for the purchase and lease of Class Vehicles. Toyota impliedly warranted that the Class Vehicles were of good and merchantable condition and quality, fit for their ordinary intended use, including with respect to safety,

reliability, operability, and the absence of material defects, and that the vehicles would pass without objection in the automotive trade.

143. The Class Vehicles, when sold and leased, and at all times thereafter, were not in merchantable condition or fit for the ordinary purpose for which vehicles are used. The Class Vehicles were not merchantable in that the Defect causes the closed-loop coolant systems in the Class Vehicles to fail to function as intended and excepted, and allows the engines in the Class Vehicles to overheat.

144. The Defect was present in the Class Vehicles when they were placed into the stream of commerce and inevitably manifests well before the end of the useful life of the Class Vehicles.

145. Toyota was provided notice of the issues complained of herein within a reasonable time by numerous complaints online, directly to Toyota and its authorized dealers, Class Members taking their vehicle to its dealers, and by direct written notice by Plaintiff Barrientos on May 24, 2024.

146. In its capacity as a supplier and/or warrantor, and by the conduct described herein, any attempt by Toyota to limit its express warranty in a manner that would exclude or limit coverage for the Defect would be unconscionable. Toyota's warranties were adhesive and did not permit negotiations. Toyota possessed superior and exclusive knowledge of the Defect, which is a latent defect, prior to offering Class Vehicles for sale. Toyota concealed and did not disclose this Defect, and Toyota did not remedy the Defect prior to sale (or afterward).

147. As a direct and proximate result of the breach of these warranties, Plaintiffs and Class Members were injured and are entitled to damages.

COUNT IV
VIOLATIONS OF THE SONG-BEVERLY CONSUMER WARRANTY ACT
FOR BREACH OF IMPLIED WARRANTY
CAL. CIV. CODE §§ 1790-1795.8
(CALIFORNIA SUBCLASS)

148. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

149. Plaintiff Barrientos and the California Subclass members who purchased or leased the Class Vehicles are “buyers” within the meaning of Cal. Civ. Code. § 1791(b).

150. The class vehicles are “consumer goods” within the meaning of Cal. Civ. Code § 1791(a).

151. Toyota is a “manufacturer” of the Class Vehicles within the meaning of Cal. Civ. Code § 1791(j).

152. Toyota impliedly warranted to Plaintiff Barrientos and the California Subclass members that Class Vehicles were “merchantable” within the meaning of Cal. Civ. Code §§ 1791.1(a) & 1792.

153. Section 1791.1(a) provides that: “Implied warranty of merchantability” or “implied warranty that goods are merchantable” means that the consumer goods must meet each of the following:

(1) Pass without objection in the trade under the contract description.

(2) Are fit for the ordinary purposes for which such goods are used.

(3) Are adequately contained, packaged, and labeled.

(4) Conform to the promises or affirmations of fact made on the container or label.

154. The Defect in the Class Vehicles is present in them when sold and substantially certain to manifest. The Class Vehicles would not pass without objection in the automotive trade because the Defect causes the coolant systems to malfunction and leak and to fail to operate as intended. The Defect thus affects the central functionality of coolant systems, leading to expensive repair costs, inconvenient service calls, and also causes the engine to wear prematurely.

155. Because the Defect prevents Class Members from accessing the rear of the vehicle, the Class Vehicles are not fit for the ordinary purposes for which such vehicles are used.

156. Class Vehicles are not adequately labeled because the labeling fails to disclose the Defect and does not advise the California Subclass members of this Defect.

157. Any attempt by Toyota to disclaim its implied warranty obligations under the Song-Beverly Act is ineffective due to its failure to adhere to Sections 1792.3 and 1792.4. Those sections of the Civil Code provide that, in order to validly disclaim the implied warranty of merchantability, a manufacturer must “in simple and concise language” state each of the following: “(1) The goods are being sold on an ‘as is’ or ‘with all faults’ basis. (2) The entire risk as to the quality and performance of the goods is with the buyer. (3) Should the goods prove defective following their purchase, the buyer and not the manufacturer, distributor, or retailer assumes the entire cost of all necessary servicing or repair.” Cal. Civ. Code § 1792.4(a). Toyota’s attempted implied warranty disclaimer does not conform to these requirements.

158. The Defect deprived Plaintiff Barrientos and the California Subclass members of the benefit of their bargain and resulted in Class Vehicles being worth less than what Plaintiff Barrientos and other California Subclass members paid.

159. As a direct and proximate result of Toyota’s breach of its implied warranties, Plaintiff Barrientos and California Subclass members received goods that contain a defect that substantially impairs their value. Plaintiff Barrientos and the California Subclass members have been damaged by the diminished value of the vehicles, the vehicles’ malfunctioning, out-of-pocket costs incurred, and actual and potential increased maintenance and repair costs.

160. Under Cal. Civ. Code §§ 1791.1(d) & 1794, Plaintiff Barrientos and California Subclass members are entitled to damages and other legal and equitable relief, including, *inter alia*, benefit-of-the-bargain damages, overpayment or diminution in value of their Class Vehicles, and reasonable attorneys’ fees and costs.

COUNT V
VIOLATIONS OF THE CALIFORNIA CONSUMERS LEGAL REMEDIES ACT
 (“CLRA”)
CAL. CIV. CODE §§ 1750–1785
(CALIFORNIA SUBCLASS)

161. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

162. Plaintiff Barrientos and the members of the California Subclass are “consumers” as defined under the CLRA. See Cal. Civ. Code § 1761(d).

163. Toyota is a “person” as defined under the CLRA. See Cal. Civ. Code § 1761(c).

164. Class Vehicles are “goods” as defined under the CLRA. See Cal. Civ. Code § 1761(a).

165. The CLRA proscribes “unfair methods of competition and unfair or deceptive acts or practices undertaken by any person in a transaction intended to result or which results in the sale or lease of goods or services to any consumer.” Cal. Civ. Code § 1770(a).

166. Toyota engaged in unfair and deceptive acts in violation of the CLRA by the practices described above and by knowingly and intentionally concealing from Plaintiff Barrientos and the California Subclass members that the Class Vehicles suffer from the Defect (and the costs, risks, and diminished value of the Class Vehicles as a result of this Defect).

Toyota’s conduct violated at least the following enumerated CLRA provisions:

- a. Toyota represented that the Class Vehicles have characteristics, uses, or benefits that they do not have, which is in violation of section 1770(a)(5);
- b. Toyota represented that the Class Vehicles are of a particular standard, quality, or grade when, in fact, they are not, which is in violation of section 1770(a)(7);
- c. Toyota advertises its Class Vehicles with the intent not to sell them as advertised, which is in violation of section 1770(a)(9);
- d. Toyota represents that its Class Vehicles have been supplied in accordance with a previous representation when they have not, which is in violation of section 1770(a)(16); and
- e. Toyota inserts an unconscionable provision into its warranty in violation of section 1770(a)(19).

167. Toyota’s unfair or deceptive acts or practices occurred repeatedly in its trade or business and were capable of deceiving a substantial portion of the purchasing public.

168. Toyota knew, should have known, or was reckless in not knowing that the Class Vehicles were defective, would fail prematurely, and were not suitable for their intended use.

169. Toyota was under a duty to Plaintiff Barrientos and the California Subclass members to disclose the defective nature of the Class Vehicles and the Defect because:

- a. Toyota knew of but actively concealed the Defect from Plaintiff Barrientos and the California Subclass;
- b. Toyota was in a superior and exclusive position to know the true facts about the Defect, which affects the central functionality of the vehicle and poses safety concerns, and Plaintiff Barrientos and the Subclass members could not reasonably have been expected to discover that the Class Vehicles contained the Defect until it manifested, which Toyota knew; and
- c. Toyota made partial representations regarding the reliability, safety, and quality but suppressed material facts regarding the Defect.

170. The facts that Toyota misrepresented to and concealed from Plaintiff Barrientos and the other California Subclass members are material because a reasonable consumer would have considered them to be important in deciding whether to purchase their Class Vehicles or pay a lesser price for them.

171. The Defect poses a serious safety defect and affects the central functionality of a vehicle because it renders the vehicle inoperable.

172. In failing to disclose the material Defect, Toyota has knowingly and intentionally concealed material facts in breach of its duty to disclose.

173. Plaintiff Barrientos and the California Subclass have suffered injury in fact and actual damages resulting from Toyota's material misrepresentations and omissions, including by paying an inflated purchase price for their Class Vehicles and incurring additional out-of-pocket expenses to deal with the Defect. Had Plaintiff Barrientos and the Subclass known about the defective nature of the Class Vehicles and the Defect, they would not have purchased or leased their Class Vehicles or would have paid less in doing so.

174. As a direct and proximate result of Toyota's unfair and deceptive conduct, therefore, Plaintiff Barrientos and the California Subclass members have been harmed.

175. Pursuant to Cal. Civ. Code § 1782(a), Plaintiff Barrientos sent a letter to Toyota notifying it of its CLRA violations on May 24, 2024 and providing them with an opportunity to correct their business practices. If Toyota does not correct its business practices, Plaintiff

1 will amend (or seek leave to amend) the complaint to add claims for monetary relief, including
2 for actual, restitutionary, and punitive damages under the CLRA.

3 176. Pursuant to Cal. Civ. Code § 1780(a), Plaintiff Barrientos, individually and on
4 behalf of the California Subclass, seeks injunctive relief for Toyota's violation of the CLRA.

5 177. Additionally, pursuant to Cal. Civ. Code §§ 1780 and 1781, Plaintiff Barrientos,
6 individually and on behalf of the California Subclass, seeks compensatory and punitive
7 damages under the CLRA and to recover their attorneys' fees and costs.

8 178. Plaintiff Barrientos' CLRA venue declaration is attached as an exhibit to this
9 complaint in accordance with Cal. Civ. Code § 1780(d).

10 **COUNT VI**
11 **VIOLATIONS OF THE CALIFORNIA UNFAIR COMPETITION LAW ("UCL")**
12 **CAL. BUS. & PROF. CODE §§ 17200–17210**
13 **(CALIFORNIA SUBCLASS)**

14 179. Plaintiffs incorporate by reference each preceding and succeeding paragraph as
15 though fully set forth herein.

16 180. The UCL proscribes acts of unfair competition, including "any unlawful, unfair
17 or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising."
18 Cal. Bus. & Prof. Code § 17200. Toyota's conduct violates each of these prohibitions.

19 **Unlawful Conduct**

20 181. Toyota's conduct is unlawful, in violation of the UCL, because, as set forth
21 herein, it violates the Song–Beverly Consumer Warranty Act, the MMWA, and the CLRA.

22 **Unfair Conduct**

23 182. Toyota's conduct is unfair because it violated California public policy,
24 legislatively declared in the Song–Beverly Consumer Warranty Act, which requires a
25 manufacturer to ensure that goods it places on the market are fit for their ordinary and intended
26 purposes.

27 183. Toyota acted in an immoral, unethical, oppressive, and unscrupulous manner, in
28 at least the following respects:

///

- a. Selling Plaintiff Barrientos and California Subclass members defective Class Vehicles;
- b. Failing to disclose the Defect despite the opportunity to do so in numerous locations that people in the market for a vehicle would be likely to encounter;
- c. Directing and furnishing replacement parts it knew would not adequately remedy the defect, and repairing defective parts with more defective parts and otherwise failing to adequately remedy the Defect during the warranty period;
- d. Refusing to repair or replace the Class Vehicles when the known Defect manifested outside the warranty period;
- e. Failing to exercise adequate quality control and due diligence over the Class Vehicles before placing them on the market; and
- f. Failing to acknowledge the scope and severity of the Defect, refusing to acknowledge the Class Vehicles are defective, and failing to provide adequate relief to Plaintiff Barrientos and California Subclass members.

184. The gravity of the harm resulting from Toyota's unfair conduct outweighs any potential utility of the conduct. The practice of selling defective Class Vehicles without providing an adequate remedy to cure the Defect harms the public at large and is part of a common and uniform course of wrongful conduct.

185. There are reasonably available alternatives that would further Toyota's business interests of increasing sales and preventing false warranty claims. For example, Toyota could have: (a) acknowledged the Defect and provided a permanent, effective fix for the Defect; and/or (b) disclosed the Defect prior to prospective consumers' purchases.

186. The harm from Toyota's unfair conduct was not reasonably avoidable by consumers. The Class Vehicles all suffer from the Defect, and Toyota has failed to disclose it. Plaintiff Barrientos and California Subclass members did not know of, and had no reasonable means of discovering, the Defect.

Fraudulent Conduct

187. Toyota's conduct is fraudulent in violation of the UCL. Toyota's fraudulent acts include knowingly and intentionally concealing from Plaintiff Barrientos and the California Subclass members the existence of the Defect and falsely marketing and misrepresenting the Class Vehicles as being functional and not possessing a defect that would cause the coolant bypass valves to fail.

188. Toyota's misrepresentations and omissions alleged herein caused Plaintiff Barrientos and the California Subclass members to purchase or lease their Class Vehicles or pay more than they would have had Toyota disclosed the Defect.

189. At all relevant times, Toyota had a duty to disclose the Defect because it had superior and exclusive knowledge of the Defect, which affects the central functionality of the vehicle and creates a safety risk for drivers and passengers, and because Toyota made partial representations about the reliability, quality, and safety of the Class Vehicles but failed to fully disclose the Defect.

190. Accordingly, Plaintiff Barrientos and California Subclass members have suffered injury in fact, including lost money or property, as a result of Toyota's unlawful, unfair, and fraudulent acts. Absent these acts, Plaintiff Barrientos and California Subclass members would not have purchased or leased their Class Vehicles at the prices they paid or would not have purchased or leased them at all.

191. Plaintiff Barrientos seeks appropriate relief under the UCL, including such orders as may be necessary: (a) to enjoin Toyota from continuing its unlawful, unfair, and fraudulent acts or practices, and (b) to restore Plaintiff Barrientos and California Subclass members any money Toyota acquired by its unfair competition, including restitution. Plaintiff Barrientos also seeks reasonable attorneys' fees and expenses.

COUNT VII
FRAUDULENT CONCEALMENT
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

192. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

193. Toyota made material omissions concerning a presently existing or past fact in violation of the common law. Toyota did not fully and truthfully disclose to its customers the true nature of the Defect. A reasonable consumer could not have discovered the existence of the Defect in their Class Vehicle prior to purchasing it.

194. Toyota made these omissions with knowledge of their falsity and with the intent that Plaintiffs and Class Members rely upon them.

195. The facts concealed, suppressed, and not disclosed by Toyota to Plaintiffs and Class Members are material in that a reasonable consumer would have considered them to be important in deciding whether to purchase or lease Class Vehicles at all or at the offered price.

196. Toyota had a duty to disclose the true quality and reliability of the Class Vehicles because the knowledge of the Defect and its details were known and/or accessible only to Toyota; Toyota had superior knowledge and access to the relevant facts; and Toyota knew the facts were not known to, or reasonably discoverable by, Plaintiffs and Class Members. Toyota also had a duty to disclose because it made many affirmative representations about the qualities and reliability of its vehicles, including references as to safety and general operability, as set forth above, which were misleading, deceptive, and incomplete without the disclosure of the additional facts set forth above regarding the actual reliability of their vehicles.

197. Had Plaintiffs and the Class known about the defective nature of the Class Vehicles, they would not have purchased or leased the Class Vehicles or would have paid less in doing so. Thus, Plaintiffs and the other Class Members were fraudulently induced to lease or purchase Class Vehicles containing the Defect.

198. Plaintiffs and Class Members reasonably relied on Toyota's material omissions and suffered damages as a result. Toyota's conduct was willful, wanton, oppressive, reprehensible, and malicious. Consequently, Plaintiffs and Class Members are entitled to an award of punitive damages.

COUNT VIII
VIOLATIONS OF THE FLORIDA DECEPTIVE AND UNFAIR TRADE
PRACTICES ACT
(FLA. STAT. §§ 501.201-501.213)
(FLORIDA SUBCLASS)

199. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

200. Plaintiff Foerst brings this claim individually and on behalf of the Florida Subclass.

201. Plaintiff Foerst and Florida Subclass members are "consumers" within the meaning of Fla. Stat. § 501.203(7).

1 202. The Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”) prohibits
2 “[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive
3 acts or practices in the conduct of any trade or commerce.” Fla. Stat. § 501.204(1). Defendants
4 engaged in unfair and deceptive practices that violated the FDUTPA as described above.

5 203. Defendants engaged in “trade or commerce” within the meaning of the
6 FDUTPA. See Fla. Stat. § 501.203(8).

7 204. Defendants caused to be made or disseminated through Florida and the United
8 States, through advertising, marketing and other publications, statements that were untrue or
9 misleading, and which were known, or which by the exercise of reasonable care should have
10 been known to Defendants, to be untrue and misleading to consumers, including Plaintiff
11 Foerst and the other Florida Class Members and otherwise engaged in activities with a
12 tendency or capacity to deceive.

13 205. In violation of the FDUTPA, Defendants employed unfair and deceptive acts or
14 practices, fraud, false pretense, misrepresentation, or concealment, suppression or omission of
15 a material fact with intent that others rely upon such concealment, suppression or omission, in
16 connection with the sale and/or lease of Class Vehicles. Defendants knowingly concealed,
17 suppressed and omitted material facts regarding the Defect and misrepresented the standard,
18 quality, or grade of the Class Vehicles, which directly caused harm to Plaintiff Foerst and the
19 Florida Class.

20 206. Defendants actively suppressed the fact that Class Vehicles contain the Defect
21 and present a safety hazard because of materials, workmanship, design, and/or manufacturing
22 defects. Further, Defendants employed unfair and deceptive trade practices by failing to
23 provide repairs of the Defect or replacement of Class Vehicles due to the Defect within a
24 reasonable time in violation of the FDUTPA. Defendants also breached their warranties as
25 alleged above in violation of the FDUTPA.

26 207. As alleged above, Defendants have known of the Defect contained in the Class
27 Vehicles for years. Prior to selling and leasing the Class Vehicles, Defendants knew or should
28 have known the Class Vehicles contained the Defect due to pre-production testing, quality

control audits, and failure mode analysis. Defendants also should have known of the Defect from the early complaints and service requests they received from Class Members and dealers, from their own investigation and issuance of service bulletins, technical tips and recalls, from repairs and/or replacements of the coolant bypass valves and component parts, and from other internal sources. Defendants, nevertheless, failed to disclose and actively concealed the dangers and risks posed by the Class Vehicles and the Defect.

208. Defendants' unfair and deceptive trade practices were likely intended to deceive a reasonable consumer. Plaintiff Foerst and members of the Florida Class had no reasonable way to know that the Class Vehicles contained the Defect were defective in workmanship and/or manufacture and posed a serious and significant safety risk. Defendants possessed superior knowledge as to the quality and characteristics of the Class Vehicles, including the Defect within their vehicles and its associated safety risks, and any reasonable consumer would have relied on Defendants' misrepresentations and omissions, as Plaintiff Foerst and members of the Florida Class did.

209. Defendants intentionally and knowingly misrepresented material facts and omitted material facts regarding the Class Vehicles and the Defect present in Class Vehicles with an intent to mislead Plaintiff Foerst and the Florida Class.

210. Defendants knew or should have known that their conduct violated the FDUTPA.

211. Defendants owed Plaintiff Foerst and the Florida Class a duty to disclose the true safety and reliability of the Class Vehicles and the existence of the Defect because Defendants:

- a. Possessed exclusive knowledge of the Defect;
- b. Intentionally concealed the foregoing from Plaintiff Foerst and the Florida Class; and/or
- c. Made incomplete representations about the safety and reliability of the foregoing facts generally, while purposefully withholding material facts from Plaintiff Foerst and the Florida Class that contradicted these representations, inter alia, that a Defect existed at the time of sale or lease.

212. Plaintiff Foerst and the other Florida Class Members have suffered an injury in fact, including the loss of money or property, as a result of Defendants' unfair, unlawful, and/or deceptive practices. In purchasing or leasing their Class Vehicles, Plaintiff Foerst and the other Florida Class Members relied on the misrepresentations and/or omissions of Defendants with respect to the safety and reliability of the Class Vehicles. Defendants' representations were untrue because the Class Vehicles are distributed with defective coolant bypass valves that fail prematurely. Had Plaintiff Foerst and the other Florida Class Members known of the Defect, they would not have purchased or leased their Class Vehicles and/or paid as much for them. Accordingly, Plaintiff Foerst and the other Florida Class Members overpaid for their Class Vehicles and did not receive the benefit of their bargain.

213. All of the wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Defendants' businesses. Defendants' wrongful conduct is part of a pattern or generalized course of conduct that is still perpetuated and repeated, both in the state of Florida and nationwide.

214. Plaintiff Foerst, individually and on behalf of the other Florida Class Members, request that this Court enter such orders or judgments as may be necessary to enjoin Defendants from continuing their unfair, unlawful, and/or deceptive practices and to provide declaratory relief, attorneys' fees, and any other just and proper relief available under the FDUTPA.

COUNT IX
UNJUST ENRICHMENT
IN THE ALTERNATIVE TO PLAINTIFFS' CLAIMS AT LAW
(NATIONWIDE CLASS OR, ALTERNATIVELY, THE STATE SUBCLASSES)

215. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though fully set forth herein.

216. This claim is pleaded in the alternative to the other claims set forth herein.

217. As the intended and expected result of its conscious wrongdoing, Toyota has profited and benefited from the purchase and lease of Class Vehicles that contain the Defect.

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218. Toyota has voluntarily accepted and retained these profits and benefits, knowing that, as a result of its misconduct alleged herein, Plaintiffs and the Class were not receiving Class Vehicles of the quality, nature, fitness, reliability, safety, or value that Toyota had represented and that a reasonable consumer would expect. Plaintiffs and the Class Members expected that when they purchased or leased a Class Vehicle, it would not contain a Defect that renders the coolant system inoperative.

219. Toyota has been unjustly enriched by its deceptive, wrongful, and unscrupulous conduct and by its withholding of benefits and unearned monies from Plaintiffs and the Class rightfully belonging to them.

220. Equity and good conscience militate against permitting Toyota to retain these profits and benefits from its wrongful conduct. They should accordingly be disgorged or placed in a constructive trust so that Plaintiffs and Class Members can obtain restitution.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, on behalf of themselves and all others similarly situated, request that this Court enter an Order against Toyota providing for the following:

- A. Certification of the proposed Class and/or Subclass, appointment of Plaintiffs and their counsel to represent the Class, and provision of notice to the Class;
- B. An order permanently enjoining Toyota from continuing the unlawful, deceptive, fraudulent, and unfair business practices alleged in this Complaint;
- C. Injunctive relief in the form of a recall or free replacement program;
- D. Equitable relief, including in the form of buy back of the Class Vehicles;
- E. Costs, restitution, damages, including punitive damages, penalties, and disgorgement in an amount to be determined at trial;
- F. An Order requiring Toyota to pay pre- and post-judgment interest as provided by law;
- G. An award of reasonable attorneys' fees and costs as permitted by law; and

H. Such other or further relief as may be appropriate.

Dated: May 31, 2024

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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial for all claims so triable.

Dated: May 31, 2024

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